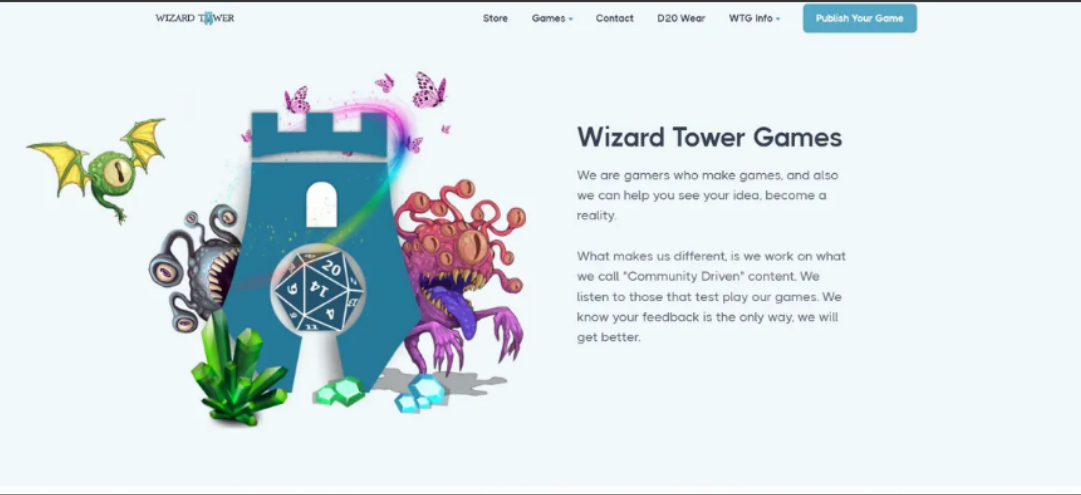


EXHIBIT A

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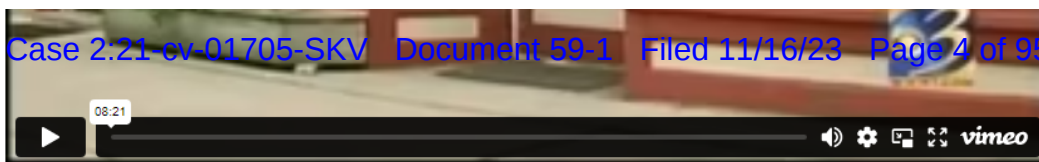
AVOID WIZARD TOWER GAMES

Owned and operated by Don O. Semora, Don't join the list of the scammed!

AKA WIZARD TOWER GAMES/2MOON PRESS/REPLICA FORGE

Check out this Tragic Story of damage caused by Don O. Semora.





DON O. SEMORA MODUS OPERANDI



Don O. Semora

Threatening & Doxing customers

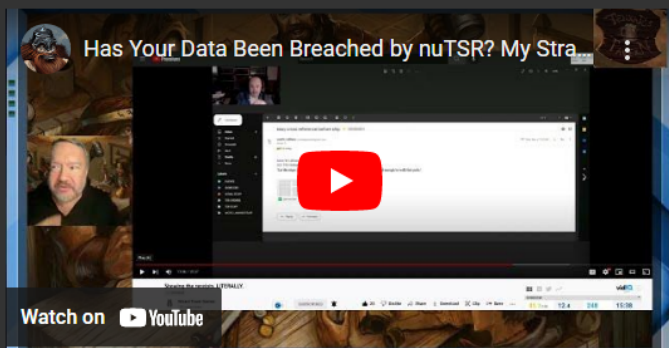
Don O. Semora

Threatening & Doxing customers part 2



Don O. Semora

Lie upon Lie's Even TSR's # 1 Hater Tenkar's Tavern has been Scammed, Misled & Lied to By Semora. Sounds like he knows it but still wants more sips of the Kool-Aid. Due to his hatred of TSR/Justin LaNassa



Consumer Protection

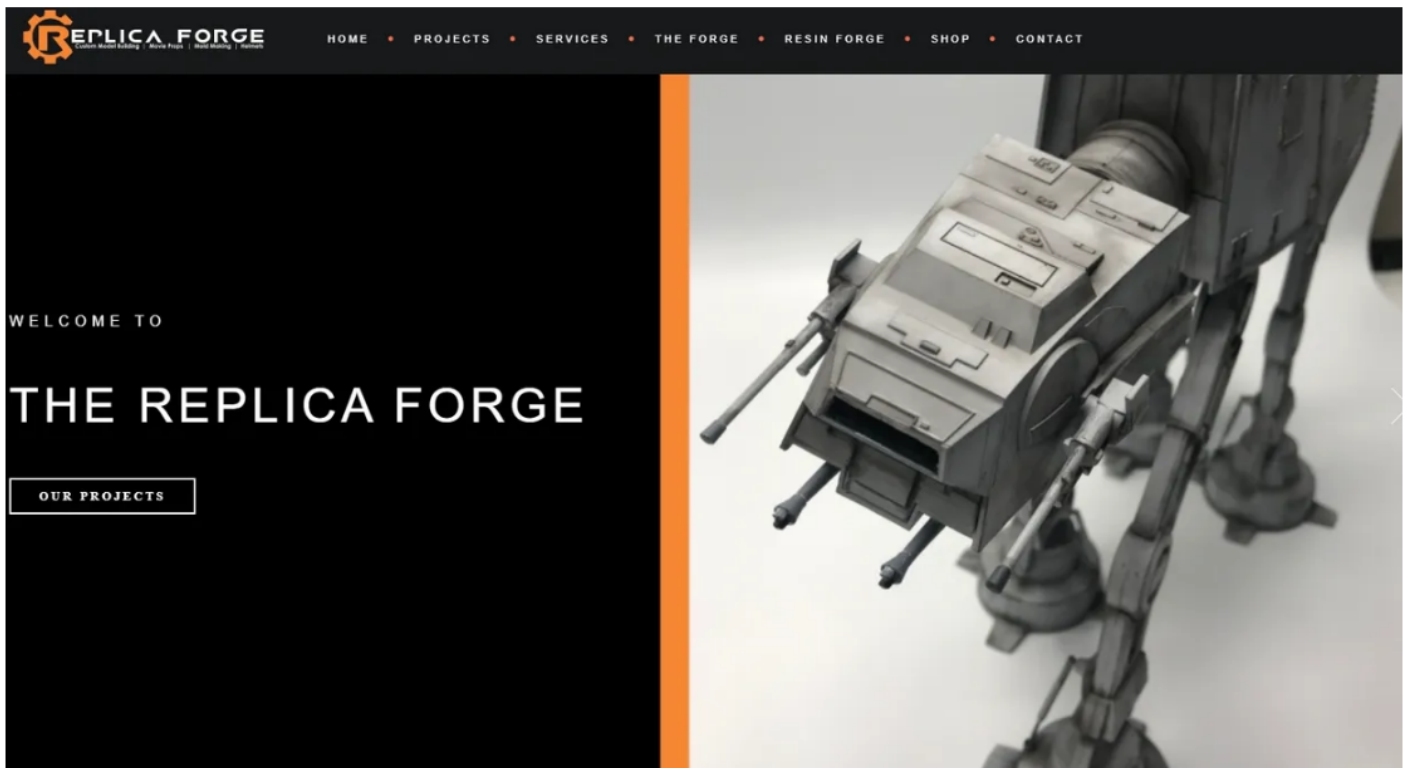
Please click the link below if you have been scammed, defrauded, or cheated out of products or services by Don O. Semora.



Please click the link below if you have been scammed, defrauded, or cheated
out of products or services by Don O. Semora.

— FILE A REPORT HERE —

AVOID REPLICA FORGE Owned By Don O. Semora



Grifting at its finest

Subscribe

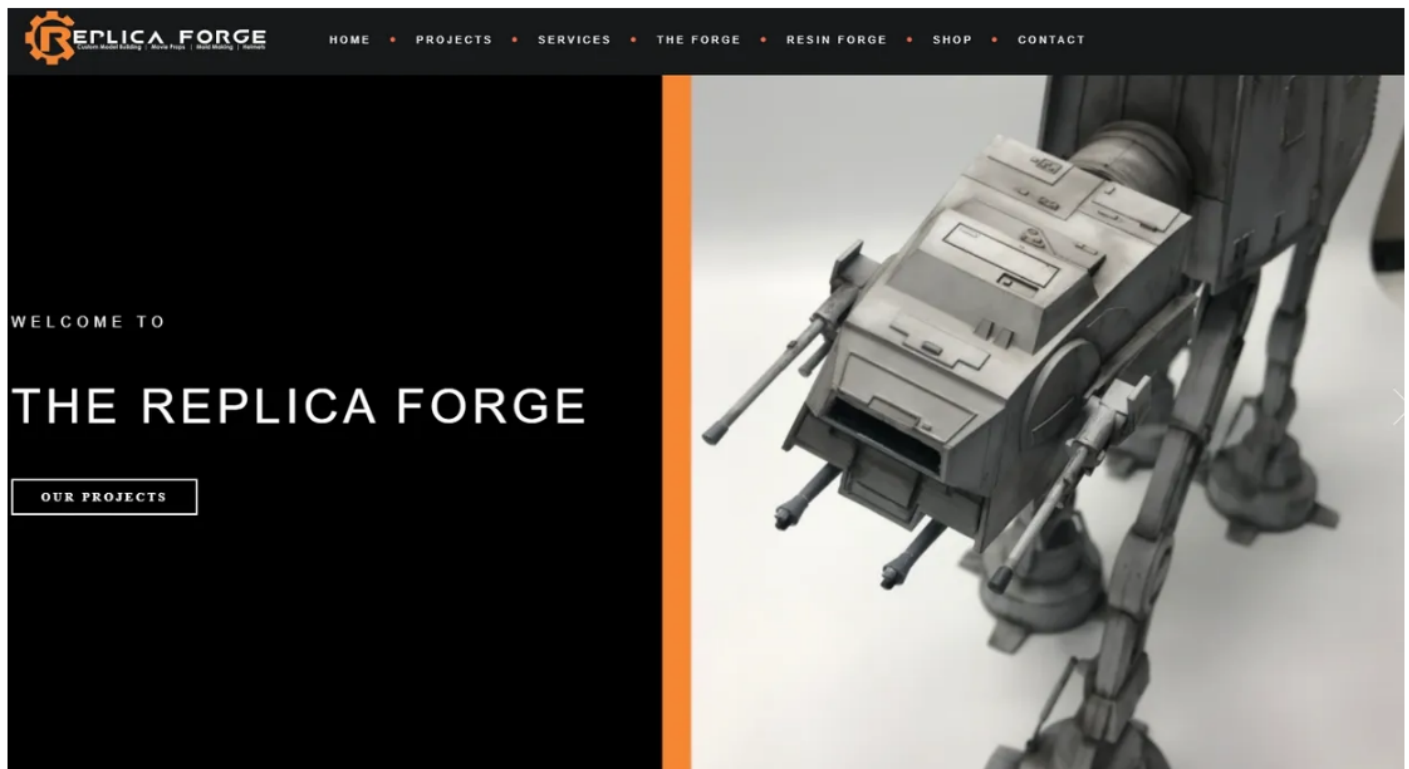
Have you been Scammed, Doxed, or have been Falsely accused by Don Semora

Email Address

— SIGN UP —



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— SIGN UP —

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Capture timestamp (UTC):	Thu, 15 Jun 2023 22:03:23 GMT
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Operating system:	Windows_NT (Node 16.17.1)
PDF length:	5
Capture ID:	kJbSg8mZvupeXMBHvw2KCL
User:	dwt-jimbudig

DON O. SEMORA HAS FORGED DOCUMENTS IN THE PAST



Semora loves to play the victim

What's very interesting is if you listen to what he accuses people of, he tells you what he is doing. Don Semora, where were you stationed? What was your MOS? What was your rank? NO service member talks about a DD214. That was possibly forged. Update

POW Network <info@pownetwork.org>

"Found NO service in any branch in the online database since 1985."

" Human Resources Command said they found no records either there in the repository or NPRC "



Attacks on Disney

Don O. Semora sure does have OPINIONS



Listen Closely to the Attacks on the Disabled



Attacks on Disney

Don O. Semora sure does have OPINIONS

Listen Closely to the Attacks on the Disabled

Don O. Semora speaks his mind about how the handicap slows his games down, and now they can play in a regular game now

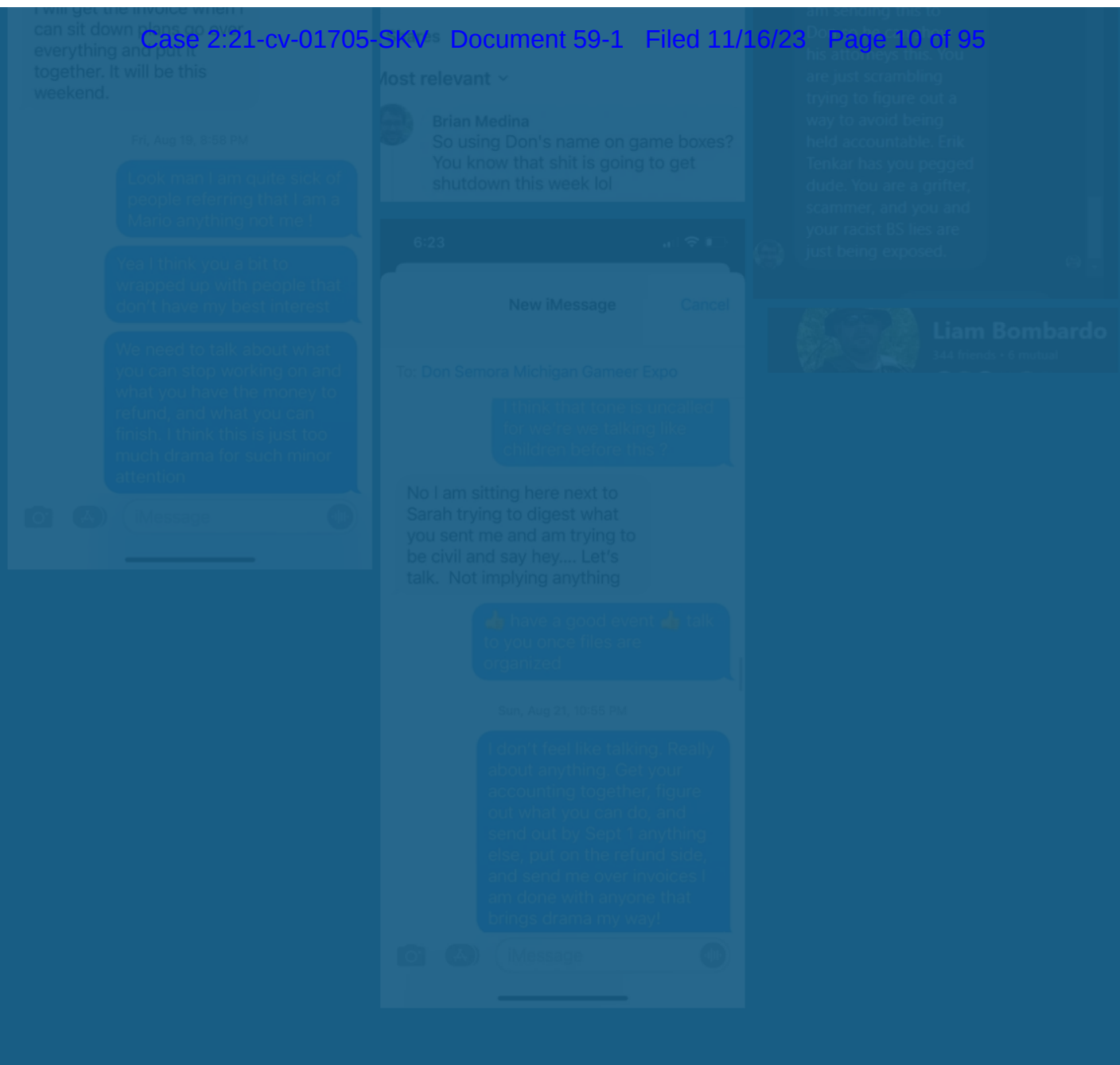
ALERT: DON SEMORA, "PROFESSIONAL DESIGNER AND AUTHOR" POSTED BY VICTORIA-STRAUSS FOR WRITER BEWARE®

[Don Semora](#), whose brand-new website [styles him](#) a professional designer of book covers, games, websites, and more.

— FIND OUT MORE —

DON O. SEMORA HAS NUMEROUS FAKE ACCOUNTS





AVOID REPLICA FORGE Owned By Don O. Semora





vaderperp
Member
RPF PREMIUM
MEMBER

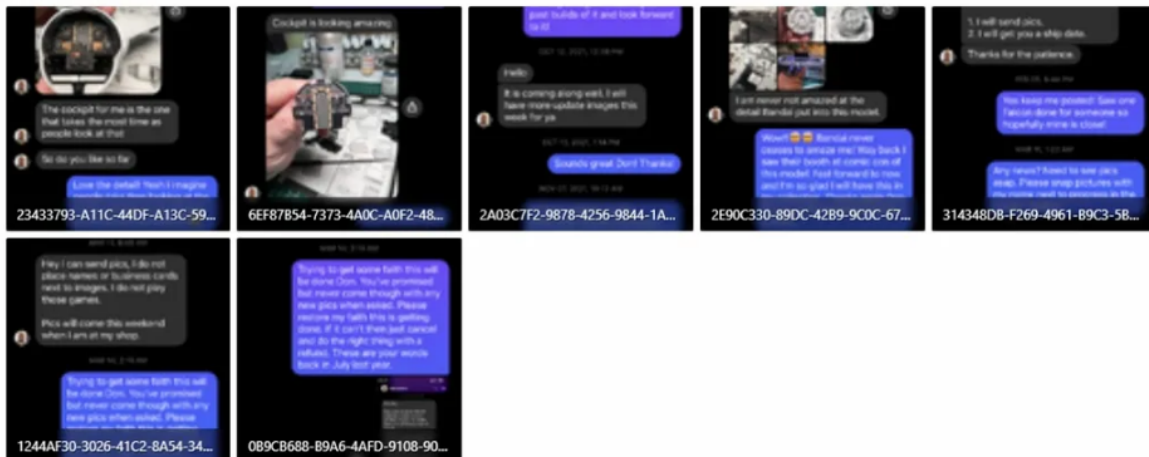
Mar 21, 2022

#1

Scammer alert!

Been a RPF member for a while but slowly making my way back into the hobby again. Think I may have been scammed by Don Semora of Replica Forge as well. Yeah I know I'm part of the blame for being so gullible but when you have two parents you're looking after due to illness time flies. Ordered a Bandai Falcon to be pro built last July. Going to see what my credit card company can do about my \$700. Below are my messages from Don as well. He also sent progress pics but I'm beginning to think they were stock photos of past projects. I'm posting them in case anyone else has received the exact same pics me.

Attachments



Grifting at its finest

[— GO TO ALERT CLICK HERE —](#)

Subscribe

Have you been Scammed, Doxed, or have been Falsely accused by Don Semora

[— SIGN UP —](#)

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Operating system:	Windows_NT (Node 16.17.1)
PDF length:	8
Capture ID:	miRuqn78EHbe3NDSy1Vtdq
User:	dwt-jimbudig

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2-Moon-Press-First-Amended-Complaint-2-1-1 (pdf)

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Don speeding ticket (pdf)

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ECF 31-1 - Order on Wizards
Preliminary Injunction (pdf)

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ECF 31 - Wizards Motion for
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ECF 37 - Response to Motion for Prelim
Inj 31p (pdf)

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ECF 38 - DJC Decl Iso Response to
Motion for Prelim Inj.s 118p (pdf)

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ECF 39 - LaNasa Decl Iso Response to
Motion for Prelim Inj 572p (pdf)

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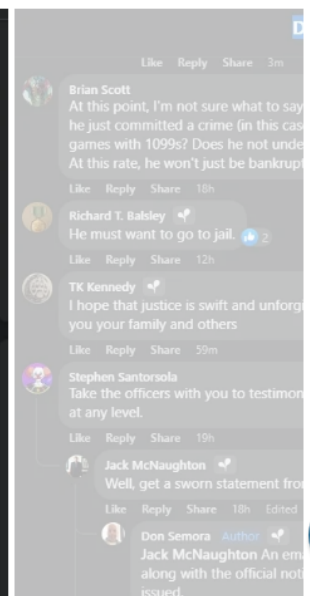
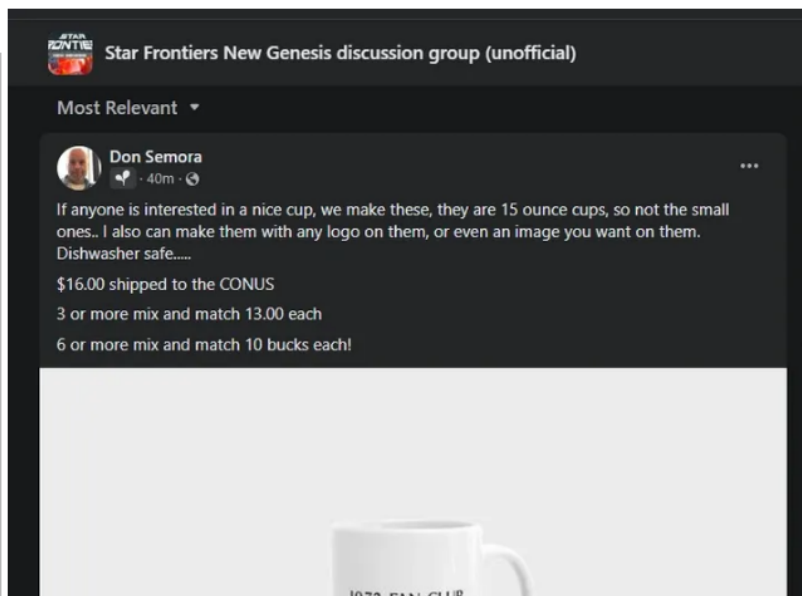
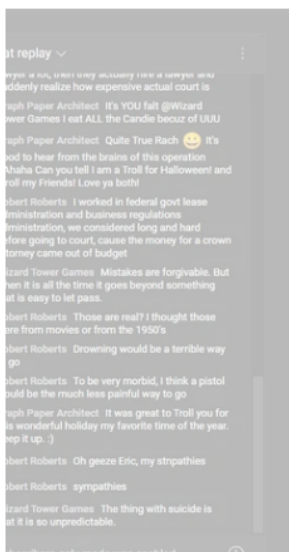
ECF 40 - Johnson Decl Iso Response to
Motion for Prelim Inj 4p (pdf)

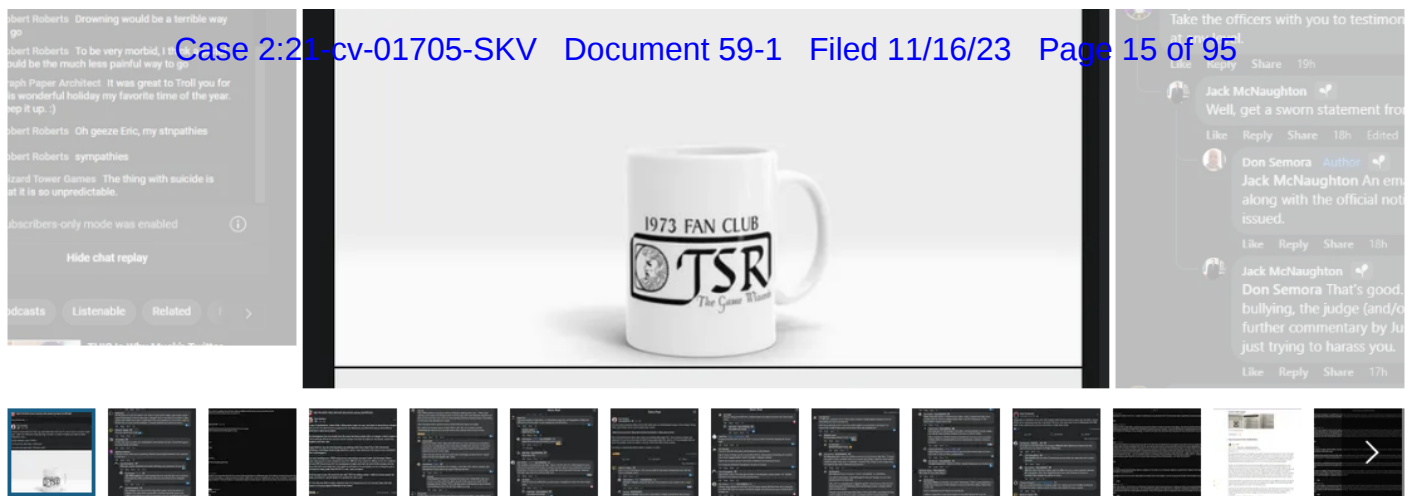
DOWNLOAD

ECF 51 - 20221214 Order on Injunction
Motion (pdf)

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ATTACKS ON TSR AND ANYONE CONNECTED





DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



[Donald Semora](#) "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Ummmm no it was not. "

My review of Goblinz: Those Pesky Goblinz

REVIEWED BY

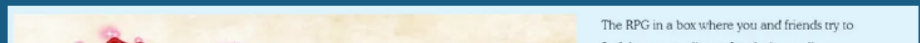
Don Semora

Watch on YouTube

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DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money

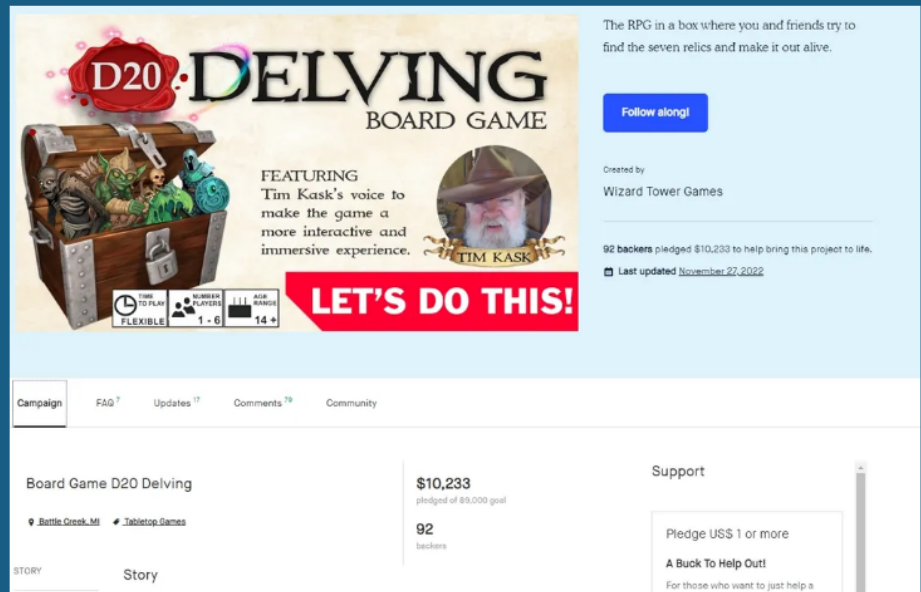


The RPG in a box where you and friends try to find the same object and destroy it in one shot.



DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money



The RPG in a box where you and friends try to find the seven relics and make it out alive.

[Follow along!](#)

Created by
Wizard Tower Games

92 backers pledged \$10,233 to help bring this project to life.
Last updated November 27, 2022

Campaign FAQ ⁷ Updates ¹⁷ Comments ¹⁹ Community

Board Game D20 Delving

[Battle Creek, MI](#) [Tabletop Games](#)

STORY Story

\$10,233
pledged of \$9,000 goal

92
backers

Support

Pledge US\$ 1 or more


A Buck To Help Out!
For those who want to just help a

Excuse Semora gives all his victims

- 1 Waiting on material chipboard
- 2 Material/Chipboard is held in customs
- 3 I am in the hospital /My daughter is in the hospital and in critical condition etc.
- 4 My store was broken into here are the pictures (Fake no police reports we checked)


Comments

Only backers can post comments. [Log in](#)




Dan Harlan
29 days ago

Crazy how cardstock would be of any interest to Customs. Appreciate the update and your work at looking at alternatives. Not sure though if shipped games from China would get through Customs any faster than cardstock though :)



Wizard Tower Games [Creator](#)
29 days ago

I do not think it was my stock that was of interest. I was told that the container was "problematic" so I imagine it was something else within it that held up everyone else. This delay is why we went through the added cost and ordered also games direct.




Stephen [Superbacker](#)
30 days ago

Thanks for the update

The people you see collaborating with Don Semora are just as bad as he is. These folks are cut from the same cloth liars and thieves.

UPDATE #23

5-15-23 UPDATE

 **Wizard Tower Games** [Creator](#)
May 15, 2023

Hello everyone! Sorry for not updating in a few weeks we have been busy here getting the web part of this project edited and made better. We know this project is late, we thought it would be a great idea to make it a "Made In House" project.

We as everyone knows have had delays over some customs issues with some of our materials. We were notified about a week or so ago our materials were being released, so that is great news. However as of a few moments ago the materials are not tracking to us yet. So we tomorrow will be going to customs and seeing if we cannot get with our import representative and see what is happening.



a "Made In House" project.

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We do have the ability to have a manufacturer in China make these games, and as a safeguard on Friday I went ahead and ordered enough games from them to cover the Kickstarter and then some. We would prefer to make them ourselves but at this point we want our supporters to get their games. We hope we still can make them, but at the end of the day games in YOUR hands is more important. This is a very complicated and unique project and one that we know you will love once you get it.

The idea of having QR codes in games is one we plan to run with in other projects, this is our ice breaker project and one with Tim's voice will be something very special. We apologize for the lateness in this, we just wanted to do something special, and thanks to Customs it kind of backfired on us.



Jan 11, 2023 UPDATE



Wizard Tower Games Creator
January 11, 2023

Hello everyone!

We have been busy as three goblins in a burlap bag here. We wanted to give an update as to the project. We are on track for this Friday to get the remaining paperstocks and cardstock for the game from U.S. Customs.



Hello everyone!

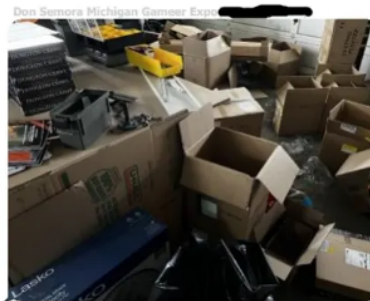
We have been busy as three goblins in a burlap bag here. We wanted to give an update as to the project. We are on track for this Friday to get the remaining paperstocks and cardstock for the game from U.S. Customs.

Yesterday we made all the final recordings with Tim Kask (See pics) and that went perfect. We could not have asked for it to go better. We are on track currently to make our January shipping of games, and plan to be posting production imagery in an update next week.

We appreciate everyone's support on this, and for those of you who have supported is with a dollar, and want to upgrade to a full game, we are in process of setting that on on the D20 Delving Website, and that should be up this weekend. We will link in an update once that happens.



#4 My shop was broken into. Here are the pictures



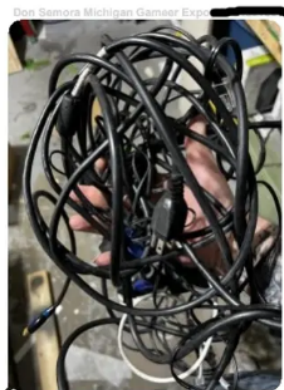
Apr 11, 2022 3:58:44 PM

Text Message

Hey I ain't being paranoid or nothing but if nothing is missing you think wizard to the coast might've sent one of their fucking knuckleheads over there I don't know they are \$1 billion company

Apr 11, 2022 6:33:22 PM

iMessage



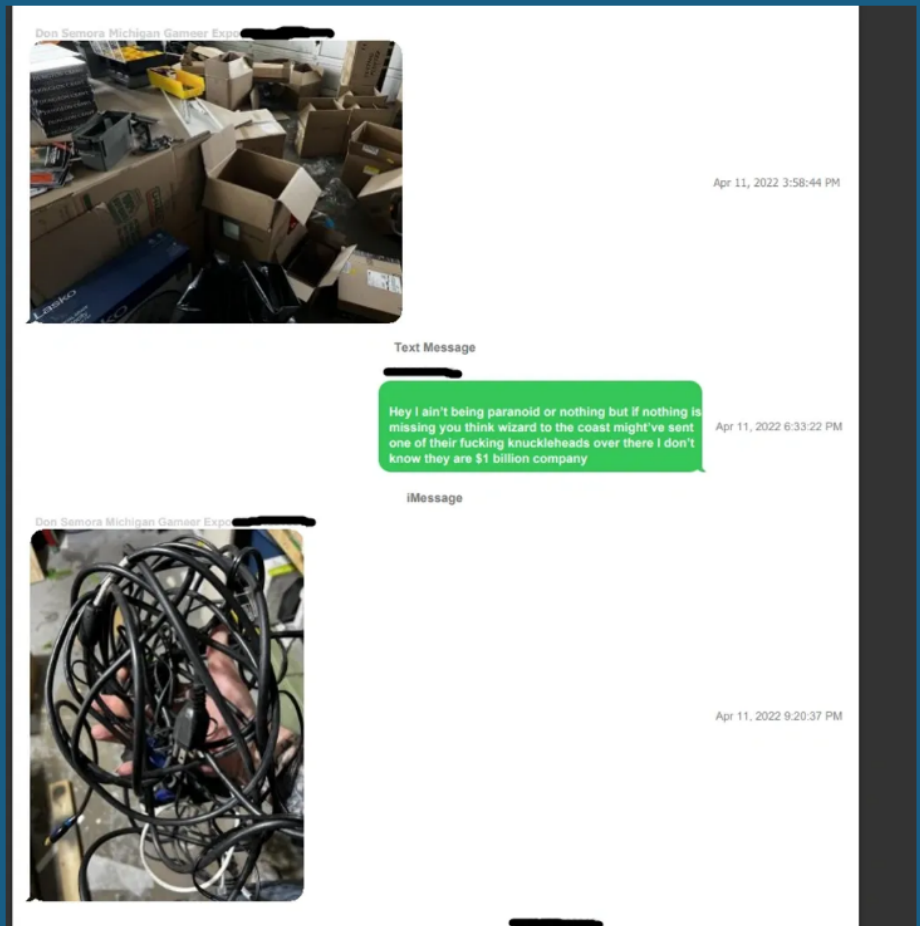
Apr 11, 2022 9:20:37 PM

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#4 My shop was broken into. Here are the pictures



+ Show More

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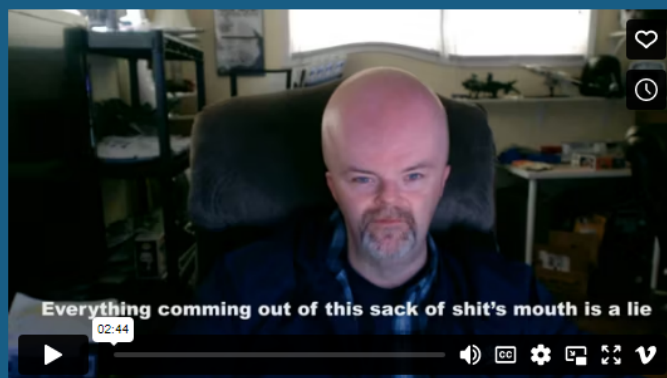
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User:	dwt-jimbudig

DON O. SEMORA EVADES THE TRUTH BY REDIRECTING



Don O. Semora

If your orders were postponed for unforeseen circumstances, or he was sick, his daughter was deathly ill, or his business was broken into, you have been "SEMORAD."



Don O. Semora

We feel for all the victims of Don O. Semora's deceptions.

IMAGES OF DON O. SEMORA'S DEVASATION

A large red banner with a yellow caution tape background. At the top, in large white letters with a red outline, is "SCAMMER ALERT". Below this, there are two circular profile pictures: one of Don Semora and one of Scott Lowell, separated by an equals sign. Below the profiles, text reads: "BE ADVISE...DON SEMORA IS USING A SECOND ACCOUNT NAMED SCOTT LOWELL TO GO IN GROUPS HE IS BANNED FROM TO SPY, SEND NASTY PRIVATE MESSAGES, MAKE THREATS AND GIVE HIMSELF GOOD REVIEWS ON HIS OWN PROP PAGE OR ON FORUM AND FACEBOOK GROUPS." The banner is flanked by a grey sidebar on the left and a grey sidebar on the right. The sidebar on the left contains text: "BS043A", "st", "Search", "Menu", "CNV?", "N", "N", "N", "N", "END". The sidebar on the right contains text: "REPLI", "Custom Model Bui", "EPICA FO", "Rene A Bernal", "Share". At the bottom of the banner, there is a row of small thumbnail images.

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Don's Story (pdf)

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Bank_02 (png)

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Bank_03 (png)

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Bank_04 (png)

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Bank_05 (png)

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PDF length:	2
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User:	dwt-jimbudig

CONTACT US

Send Message

Message

— SEND —

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Looking for Help Fighting Don's Lie's

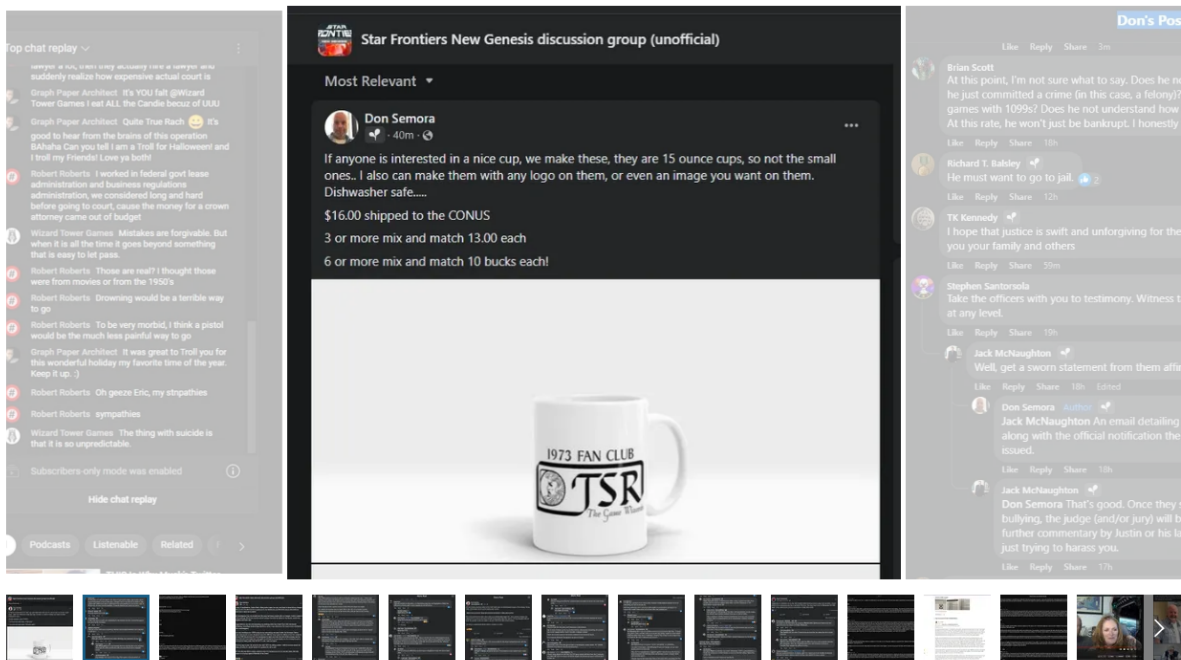
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Operating system:	Windows_NT (Node 16.17.1)
PDF length:	2
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User:	dwt-jimbudig

ATTACKS ON TSR AND ANYONE CONNECTED



DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



[Donald Semora](#) "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Ummmm no it was not."



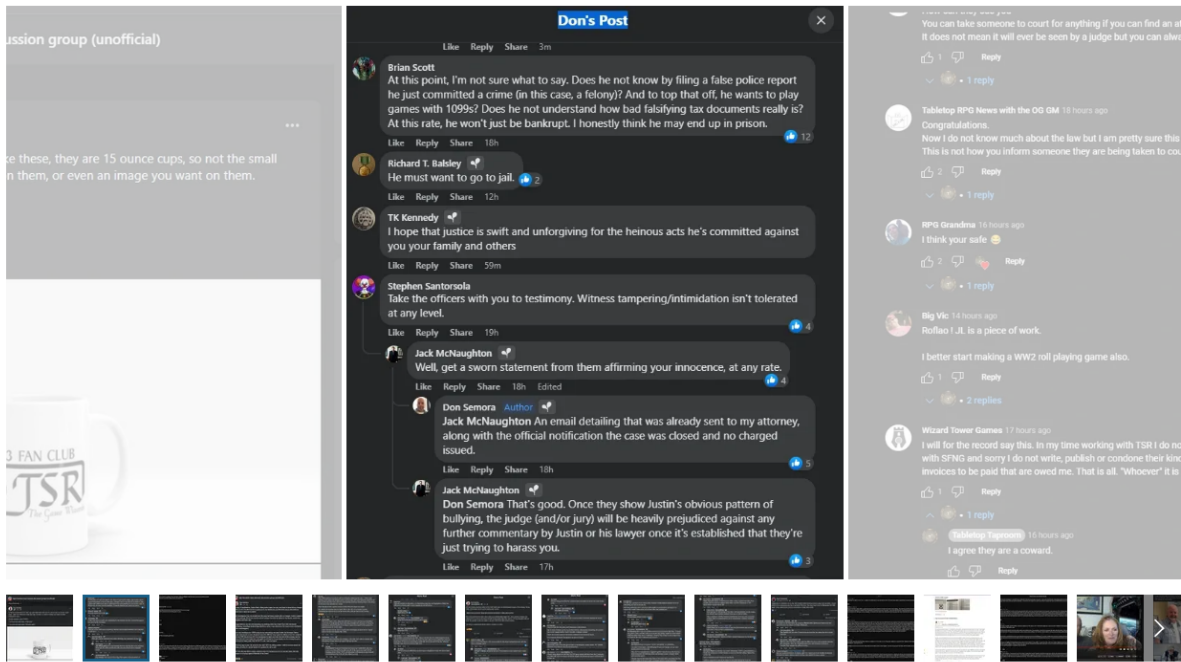
DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money



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User:	dwt-jimbudig

ATTACKS ON TSR AND ANYONE CONNECTED



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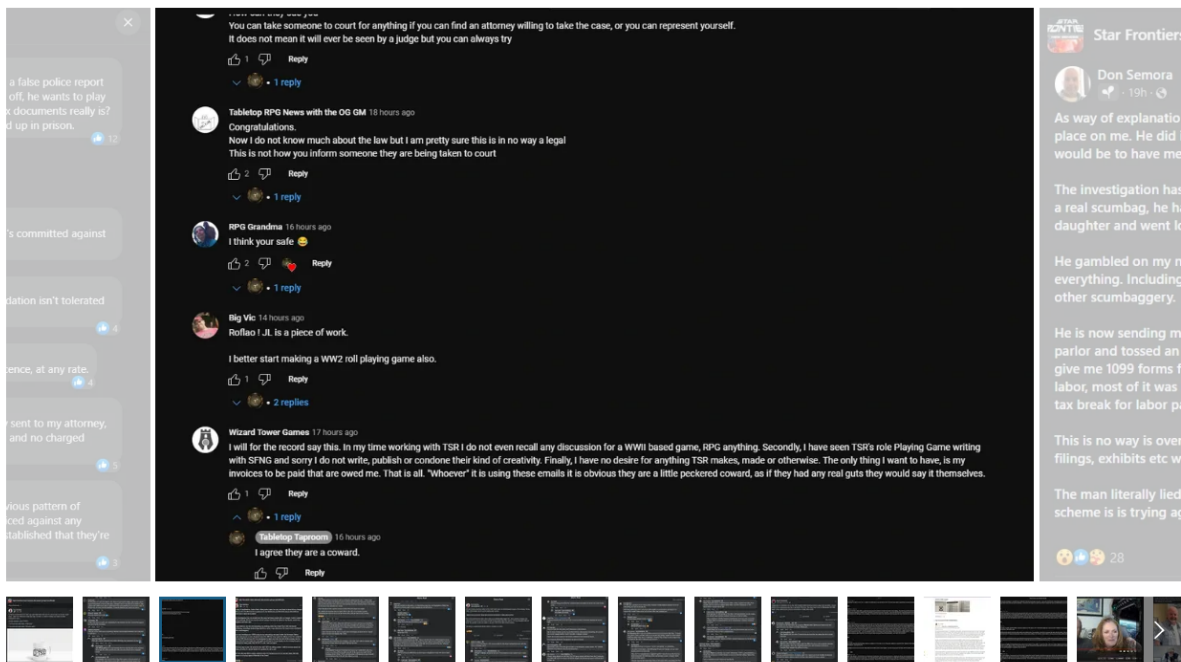
92 Backers scammed out of their money

The RPG in a box where you and friends try to



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ATTACKS ON TSR AND ANYONE CONNECTED



DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



[Donald Semora](#) "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Ummmm no it was not."



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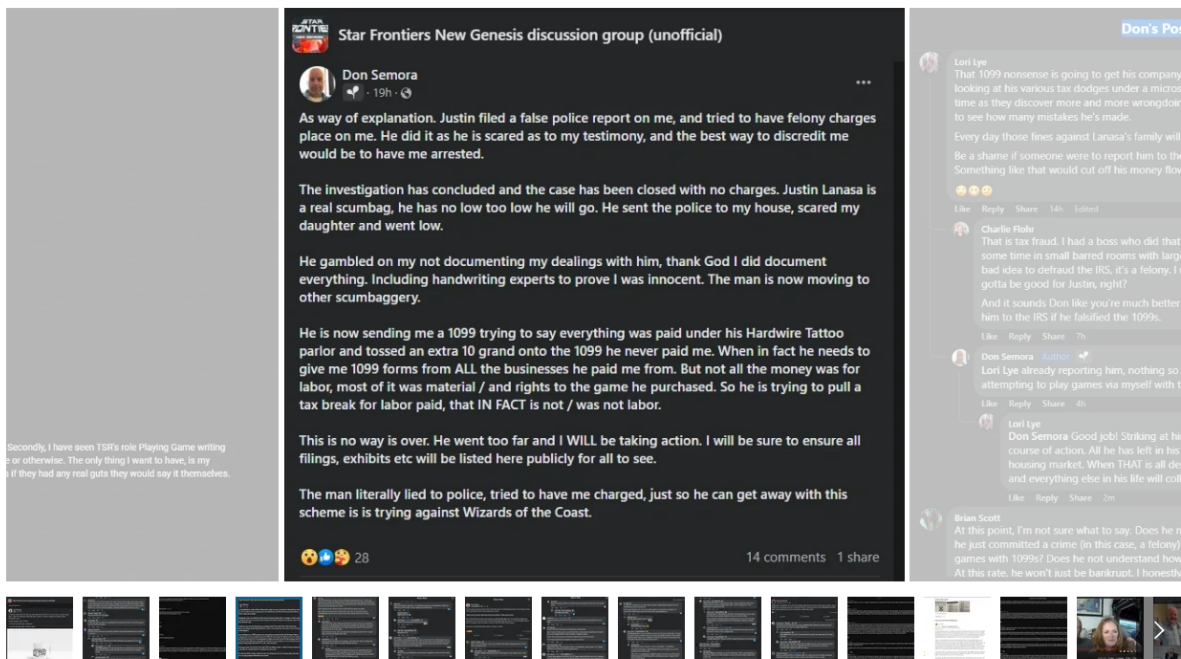
92 Backers scammed out of their money

The RPG in a box where you and friends try to

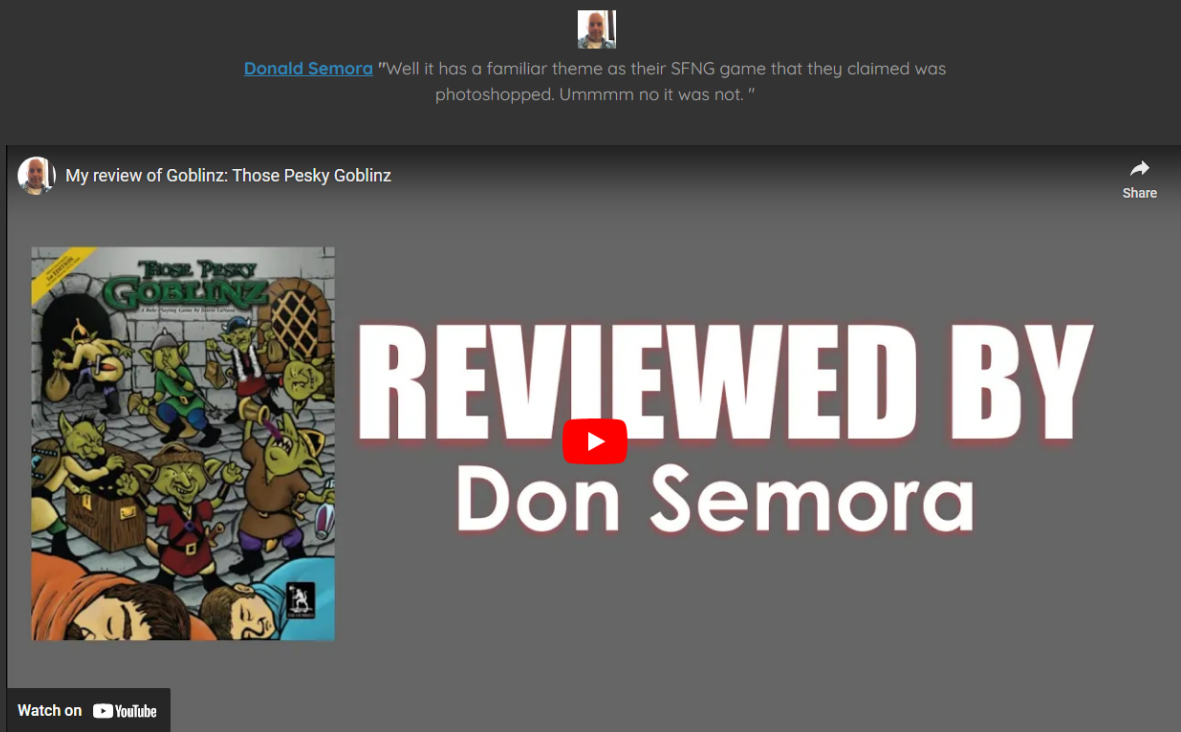


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ATTACKS ON TSR AND ANYONE CONNECTED



DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



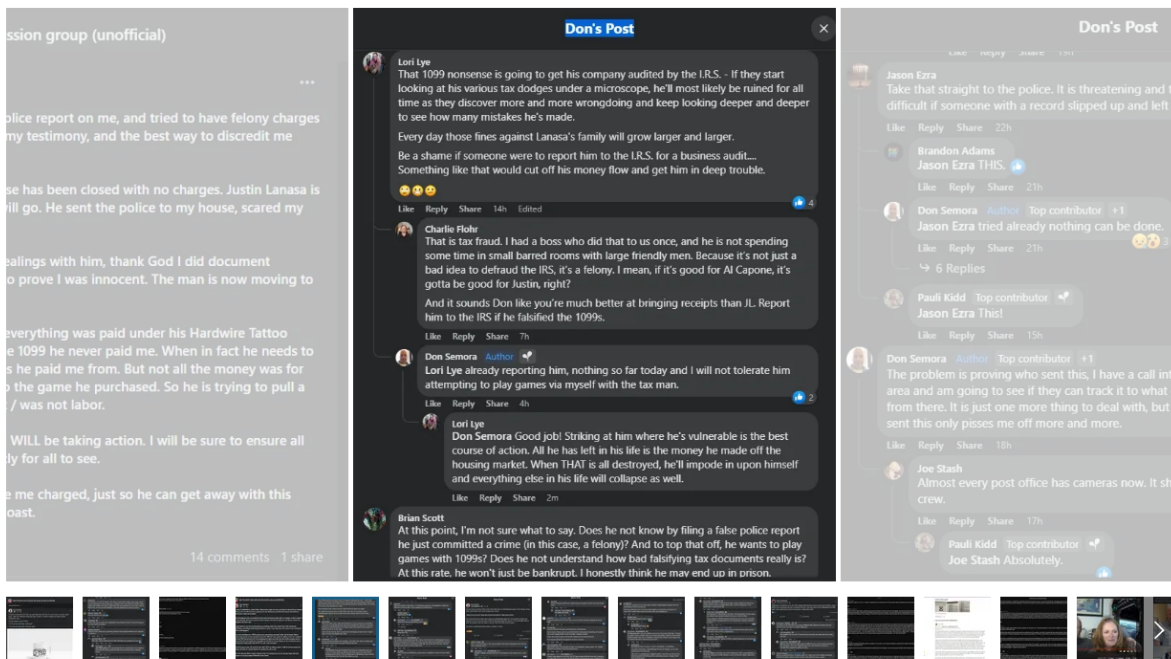
DON SEMORA RECENT KICKSTARTER SCAM



02 Backers scammed out of their money

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ATTACKS ON TSR AND ANYONE CONNECTED



DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



[Donald Semora](#) "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Ummmm no it was not."

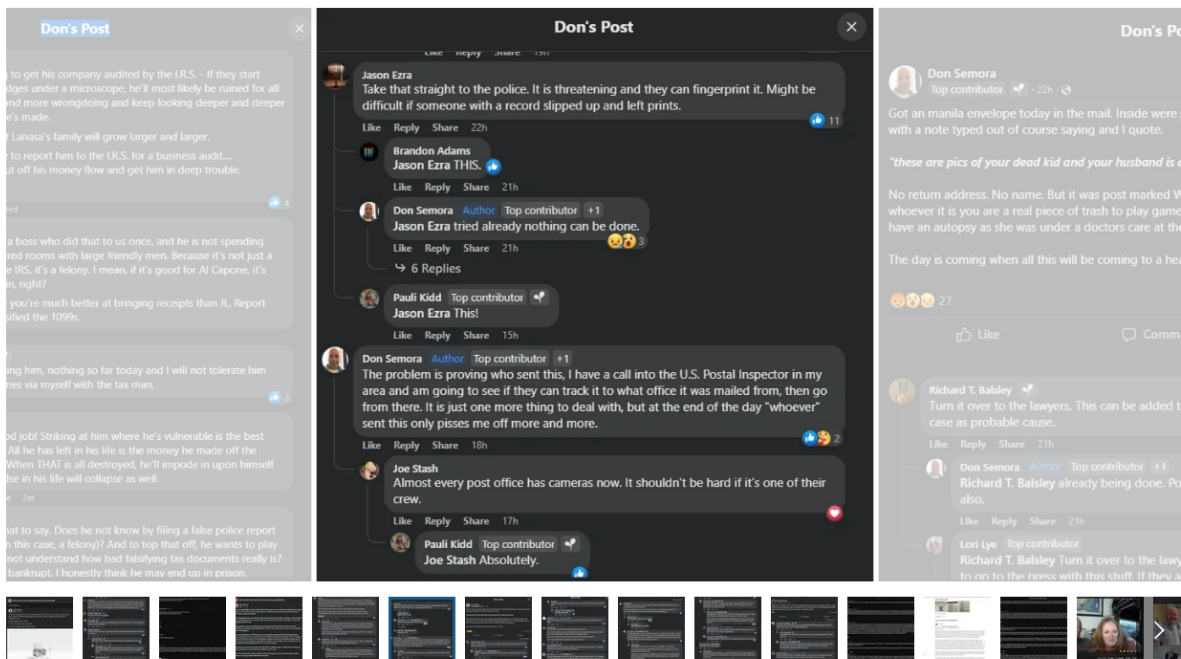


DON SEMORA RECENT KICKSTARTER SCAM



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ATTACKS ON TSR AND ANYONE CONNECTED



DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



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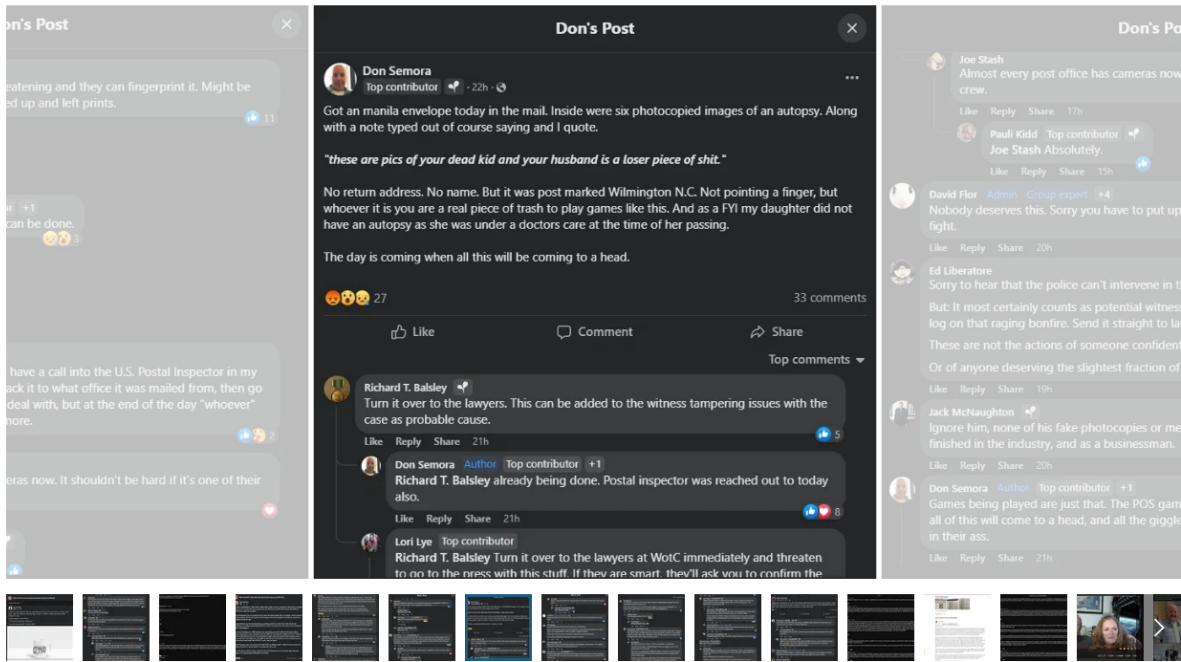


DON SEMORA RECENT KICKSTARTER SCAM



02 Backers seemed out of their money

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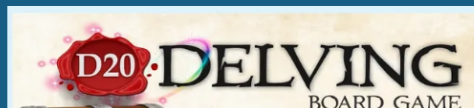


[Donald Semora](#) "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Ummmm no it was not."



DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money

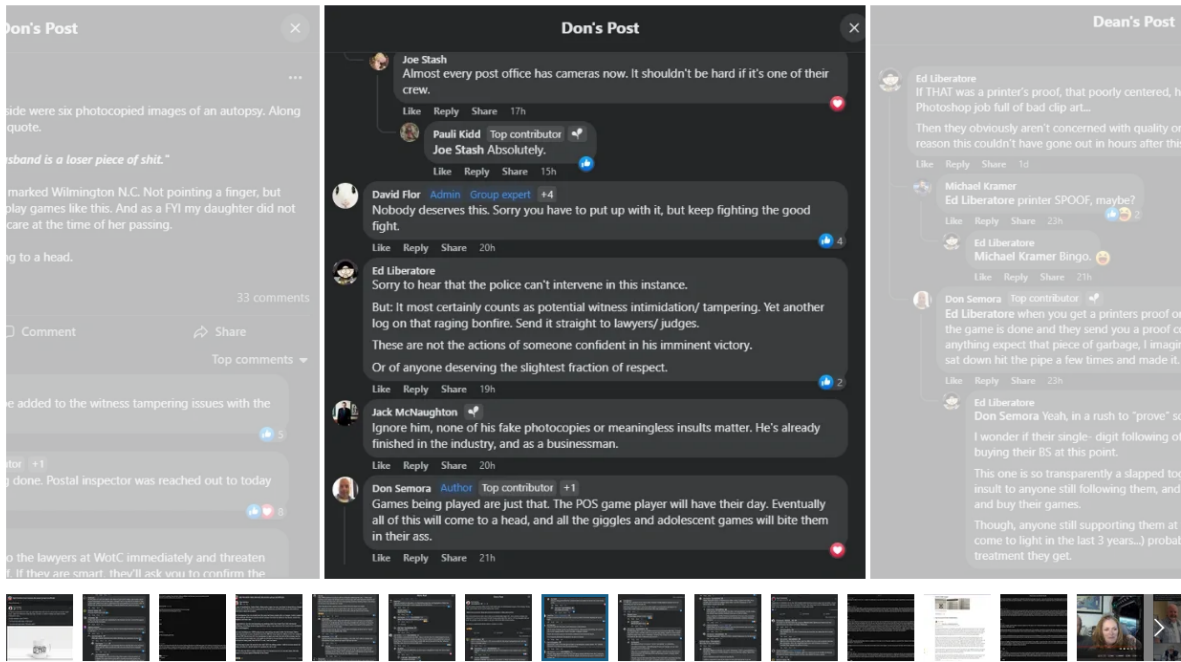


The RPG in a box where you and friends try to find the seven relics and make it out alive.

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My review of Goblinz: Those Pesky Goblinz

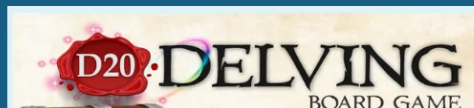
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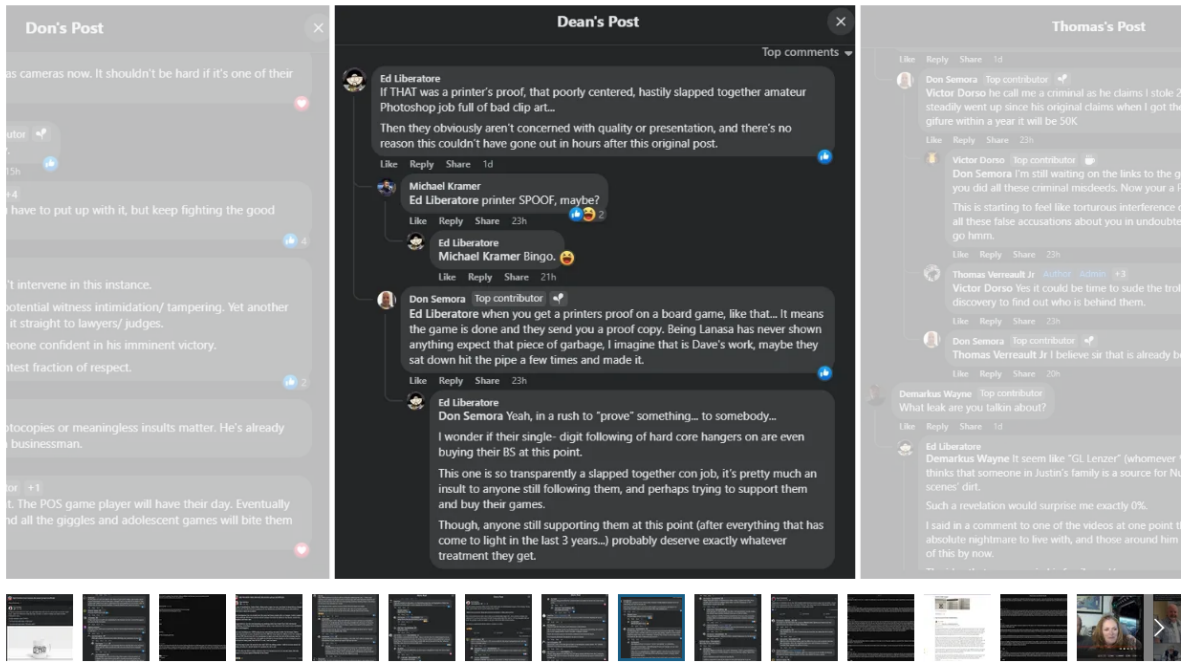


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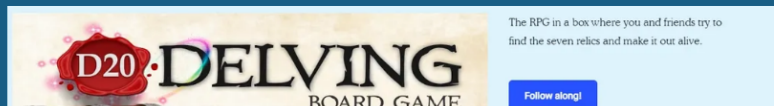


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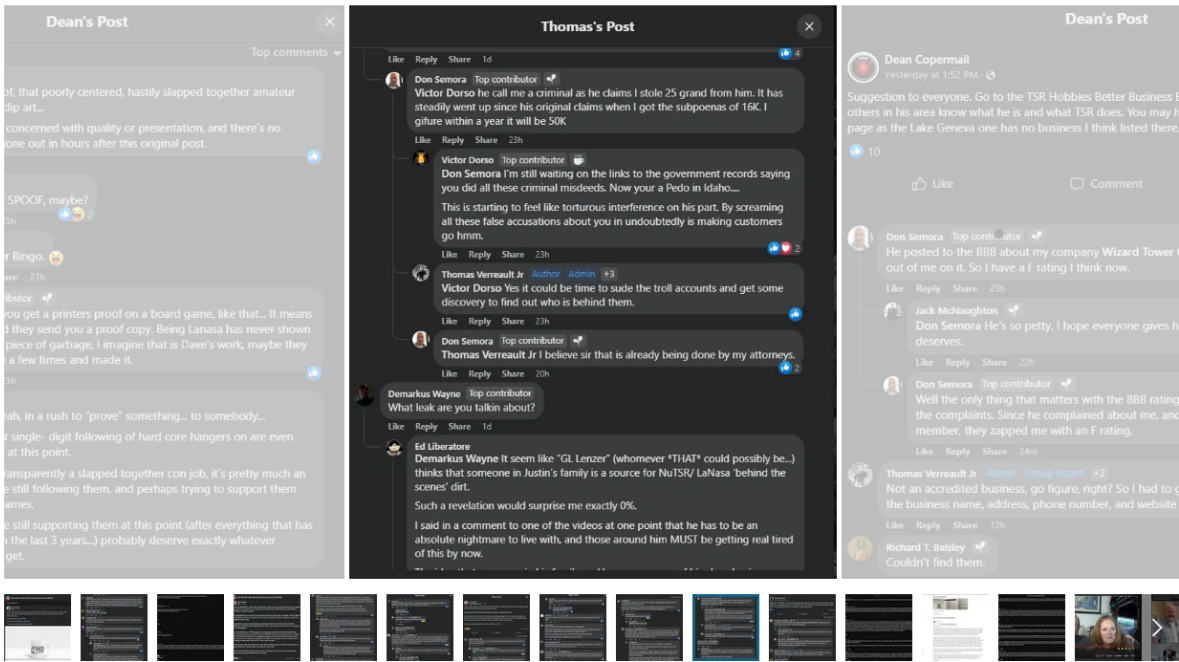


DON SEMORA RECENT KICKSTARTER SCAM

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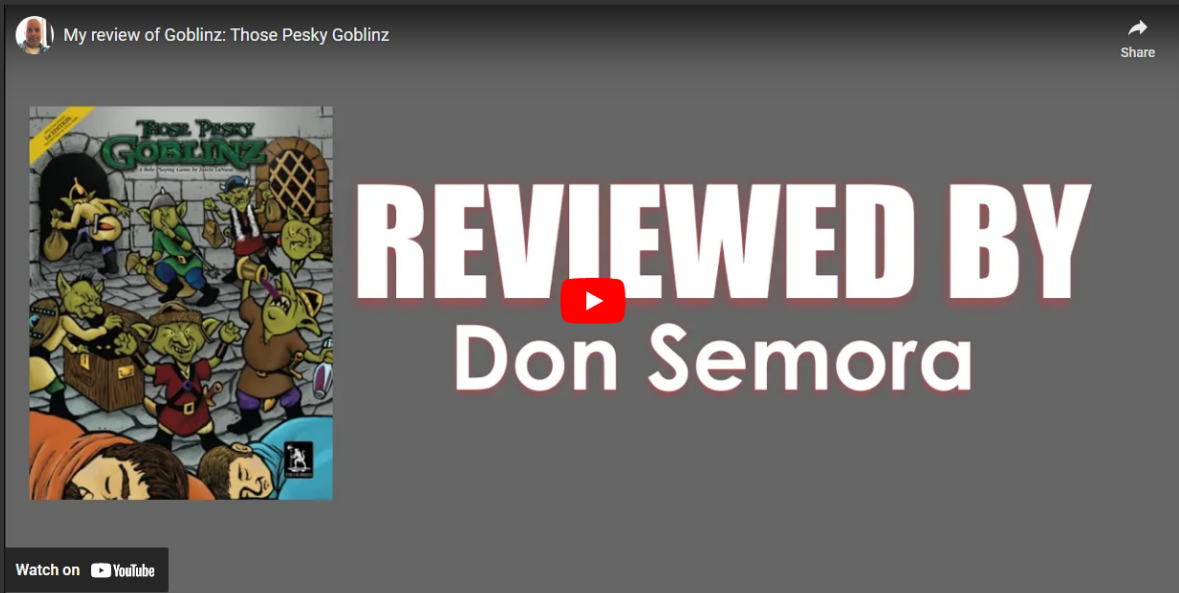
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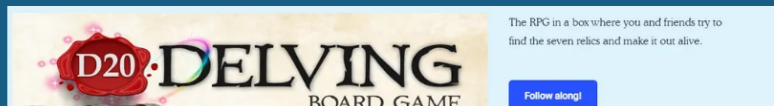


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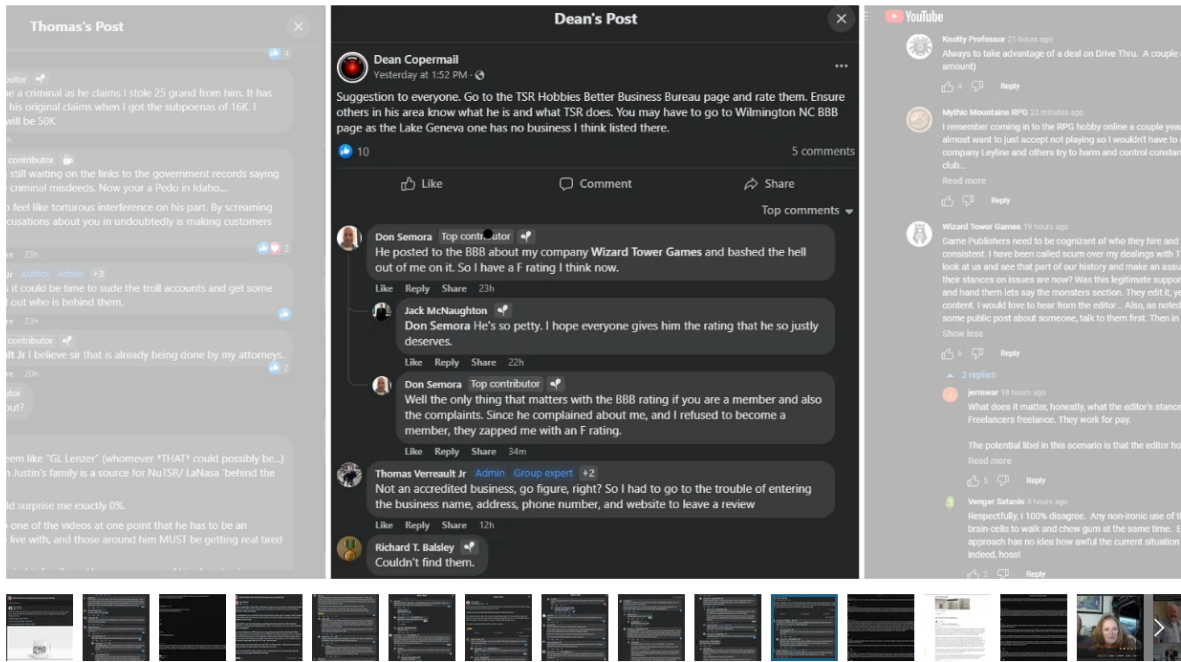


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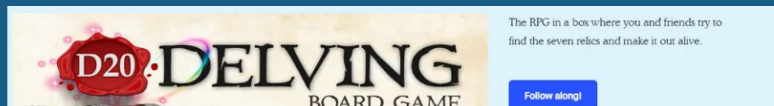


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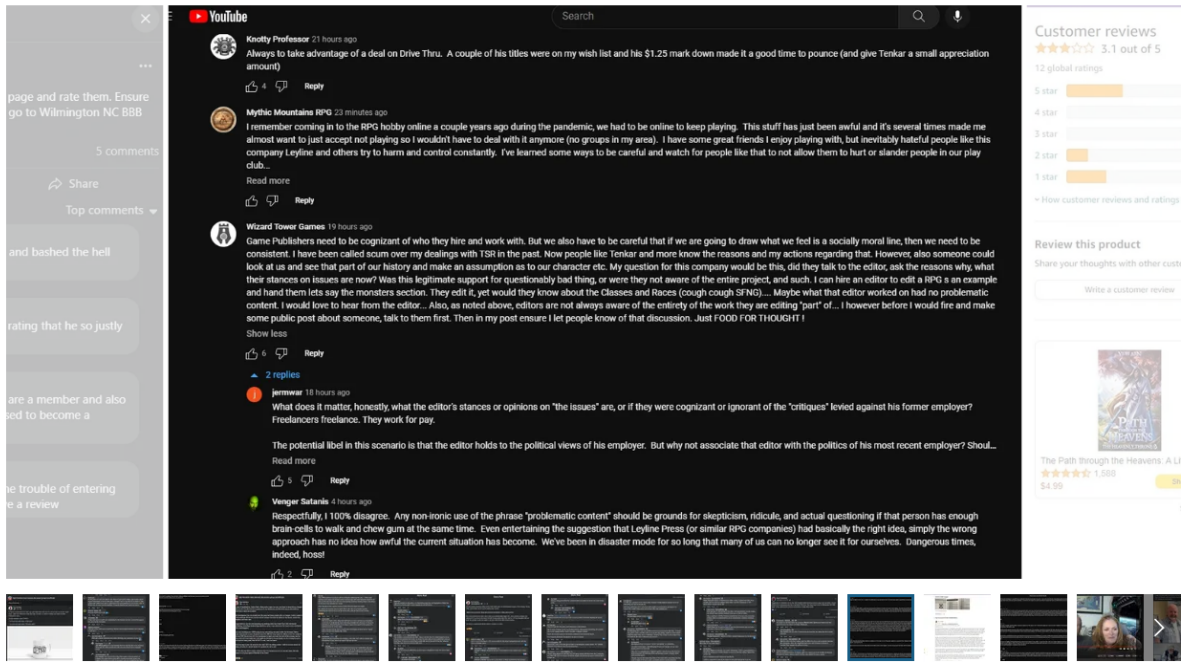


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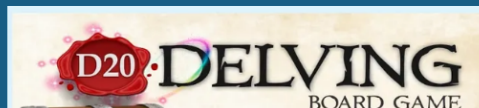


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The RPG in a box where you and friends try to find the seven relics and make it out alive.

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ATTACKS ON TSR AND ANYONE CONNECTED

Customer reviews
★★★★☆ 3.1 out of 5
12 global ratings

5 star 48%
4 star 0%
3 star 0%
2 star 18%
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Don Semora
★★★★☆ Since I am a confirmed Purchaser
Reviewed in the United States on February 22, 2023
Verified Purchase

This game has racist tropes in it, combined with content not suitable for kids makes it a no go. I purchased this game and see other reviewers who are the author using various accounts to give it 5 stars. The game has grammar and editing issues. The rules are NOT complete, they leave the player having to guess how to play large portions of it. I am not sure also why the author has to attack those he dislikes in it, as in the module inside of it there is an NPC that he uses as a way to attack a person the author dislikes.

He also steps on Tolkien's IP with the insertion of Hobbits in this, which he has denied doing on social media, yet it is in the game. I on my YouTube give a detailed review of this game with images etc, my YouTube has the same name as I review here under. I suggest you look for it. My other issues are many with this. The worst are the racist tropes inside of it, which allow you to be a white Goblin who is always a victim, and everyone wants to be like. Or you can be a black goblin which no one likes, and who is good for creating violence. I also will add it has the player being able to be a Slaver which I think it tacky and not okay for kids. I will also note that the spells in this game many directly take from D&D which is a shame.

A pity Amazon allows non purchasers to review books. But being the only VERIFIED purchaser of this game, I will say warning. It is offensive, confusing, nor is it complete. Not suitable for kids or even adults really. Again, I back everything in my review on my YouTube review.

My end note here will be to also let the potential customer know that of the content in this book over half of it is not the game or rules. It is full of advertisements for the author's businesses, and also a game module. Actual core rules is less than 10 pages, with the bulk of the core rules being spell lists.

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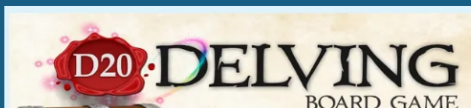


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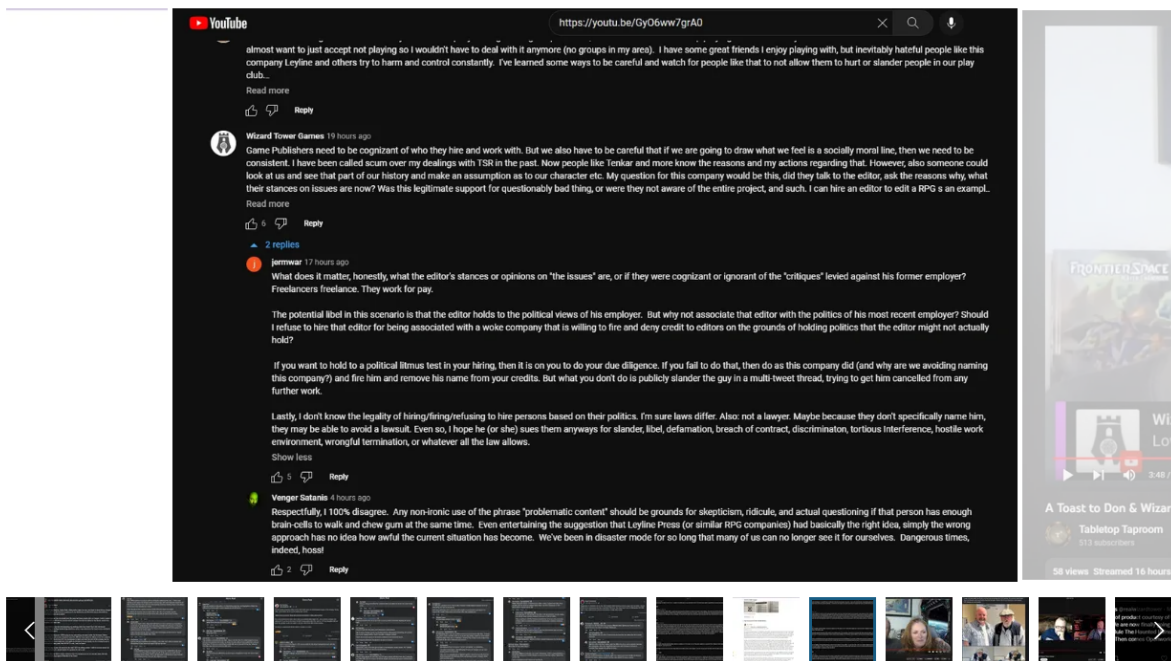


The RPG in a box where you and friends try to find the seven relics and make it out alive.

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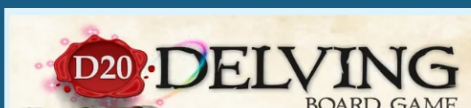


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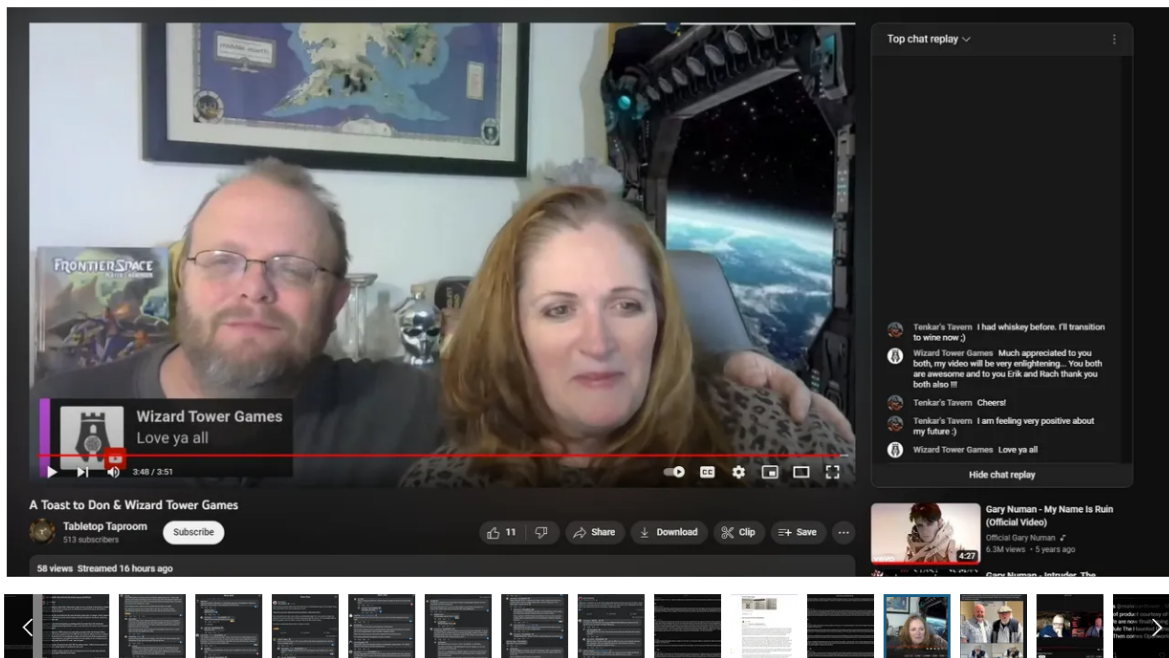


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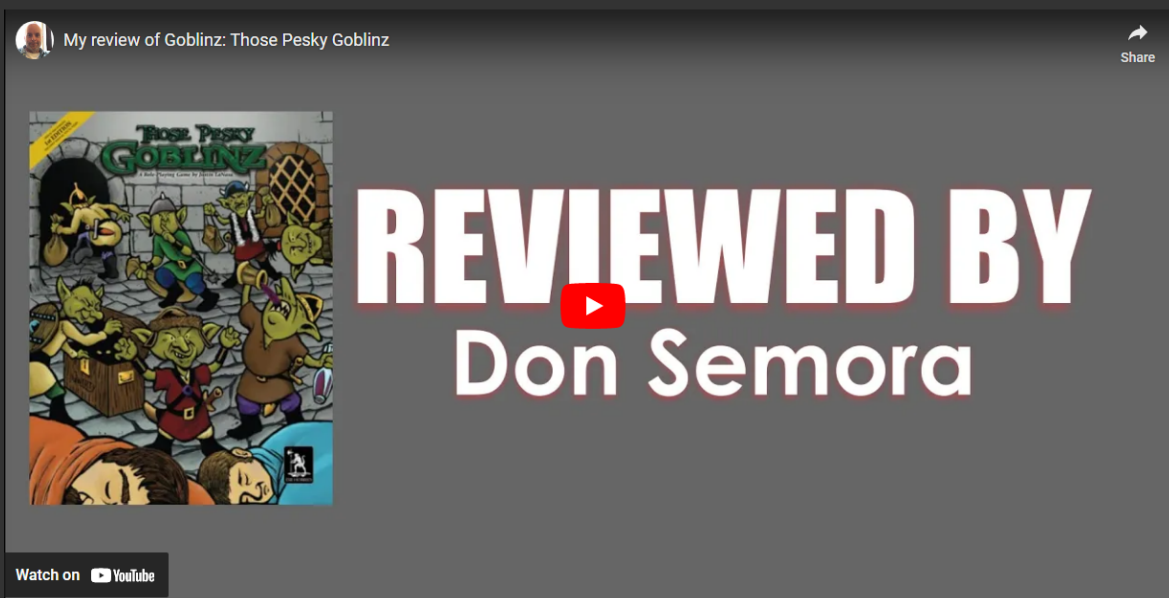
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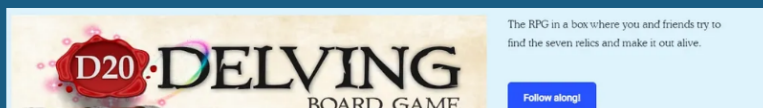


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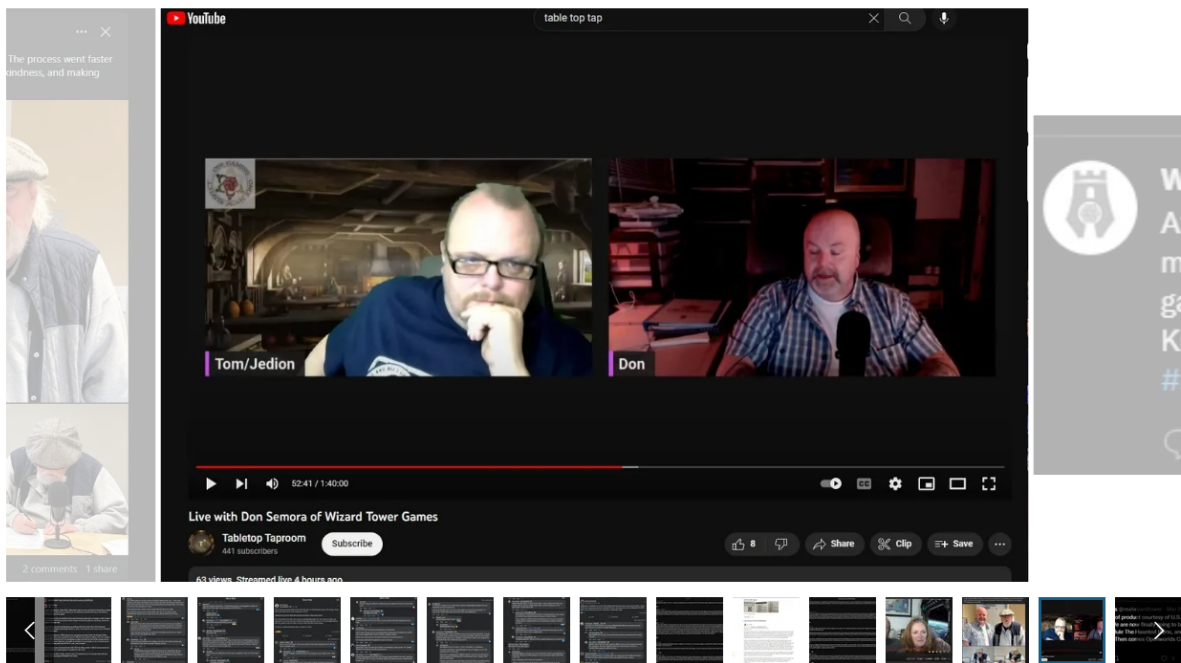


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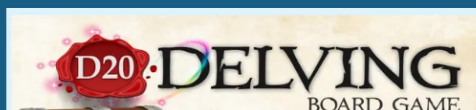


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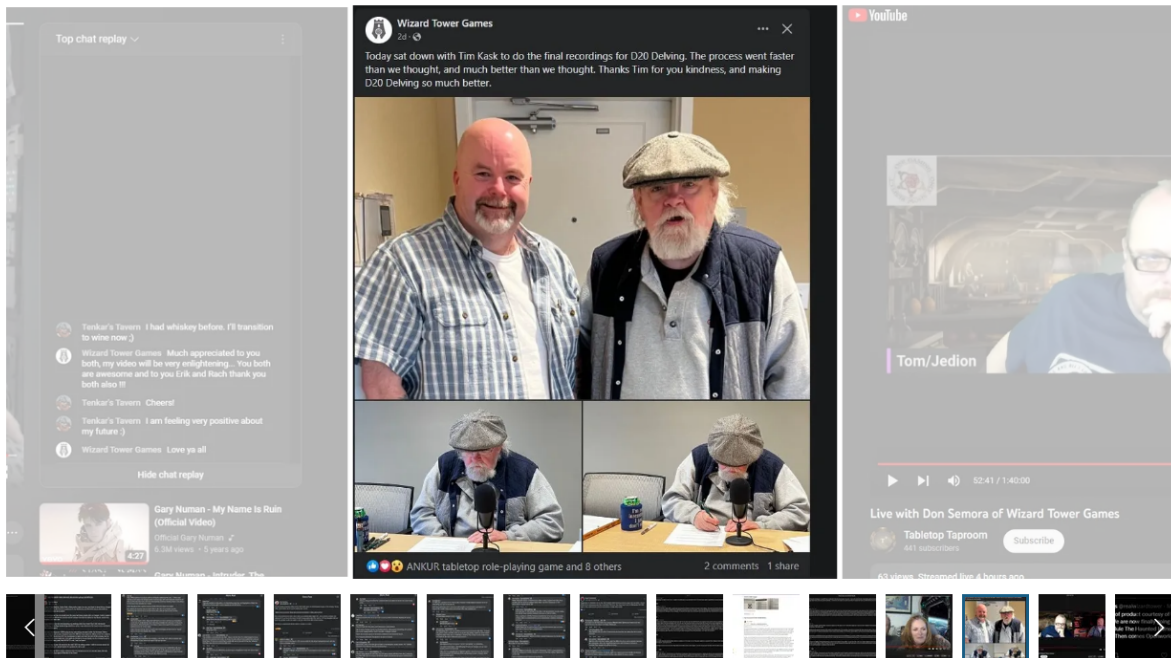


The RPG in a box where you and friends try to find the seven relics and make it out alive.

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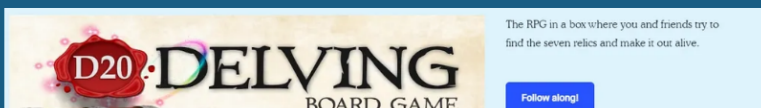


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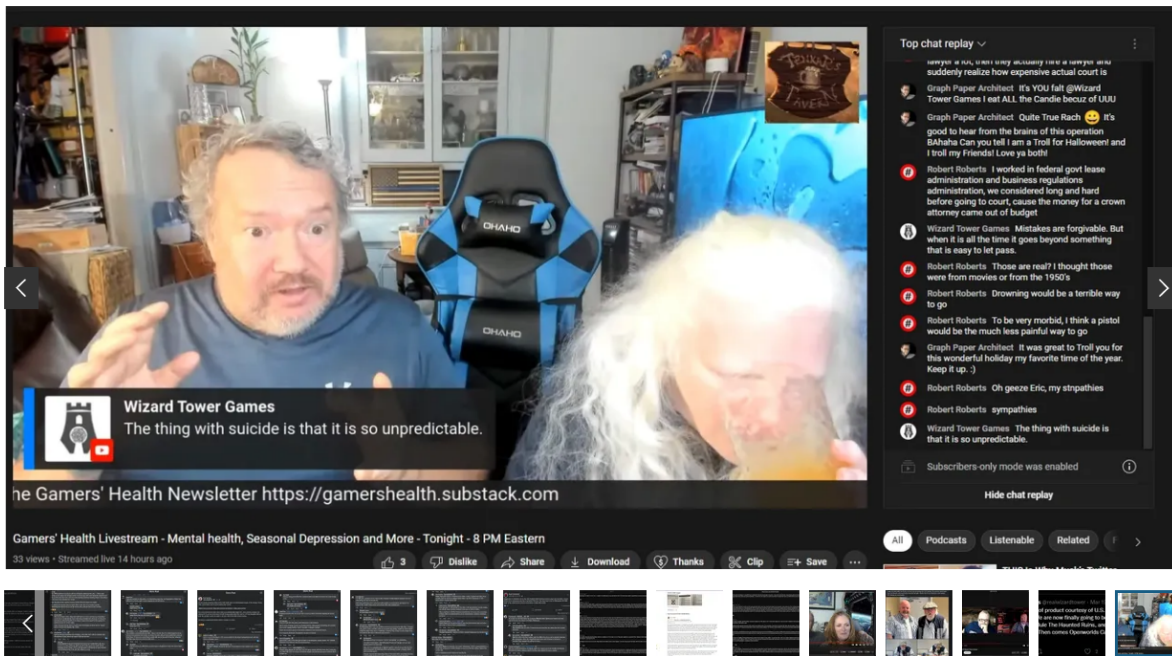


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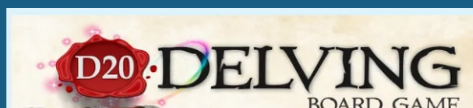


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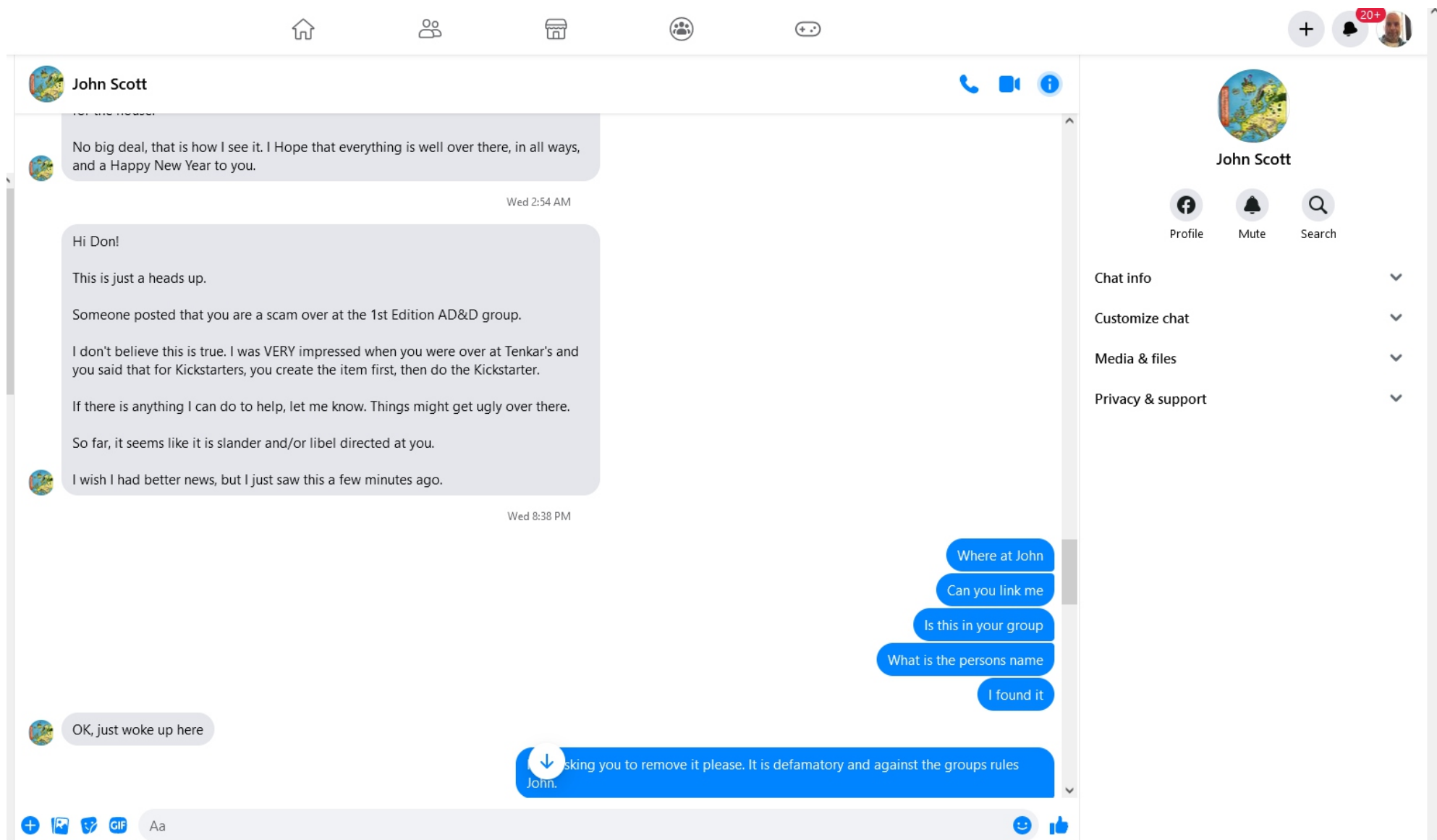


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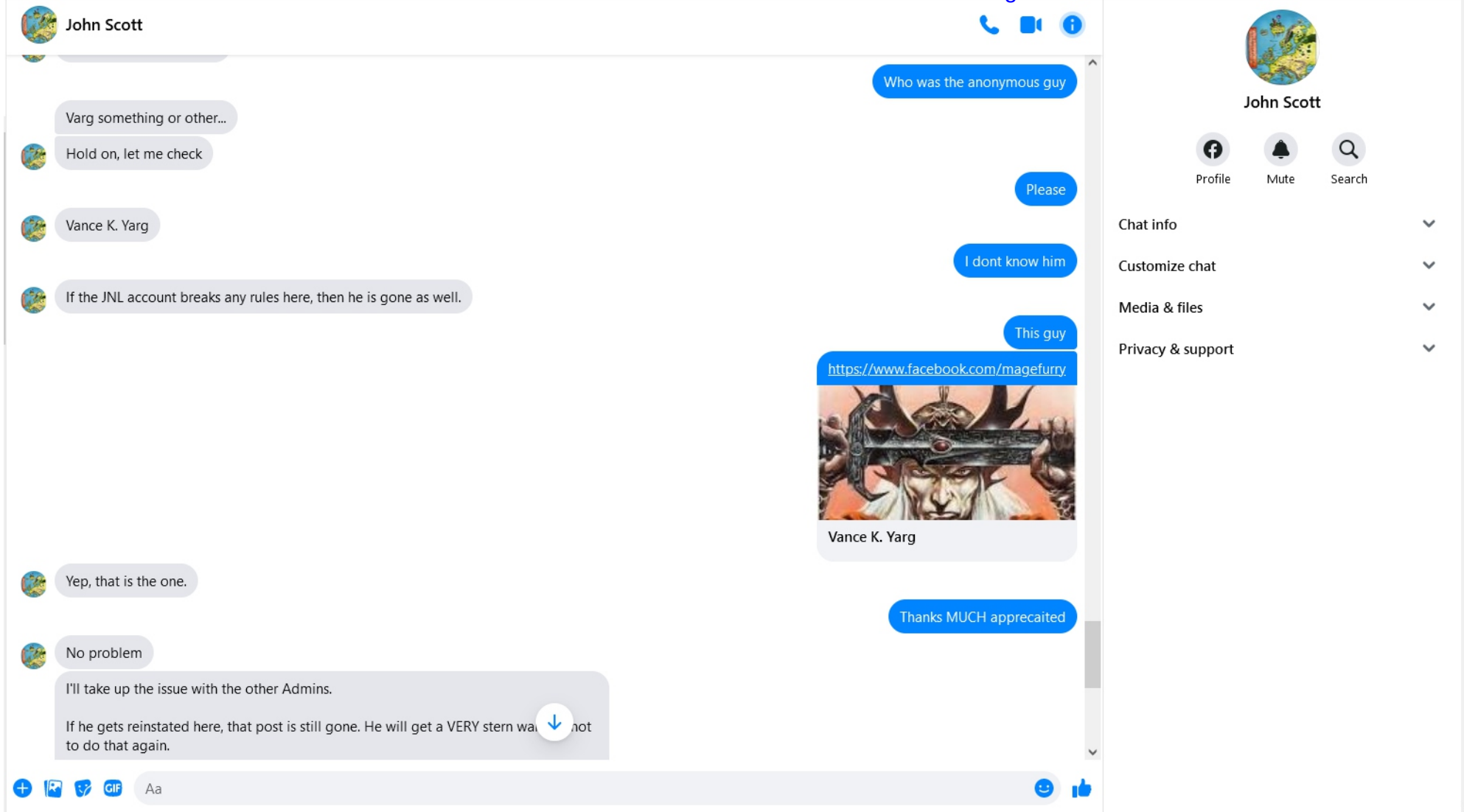
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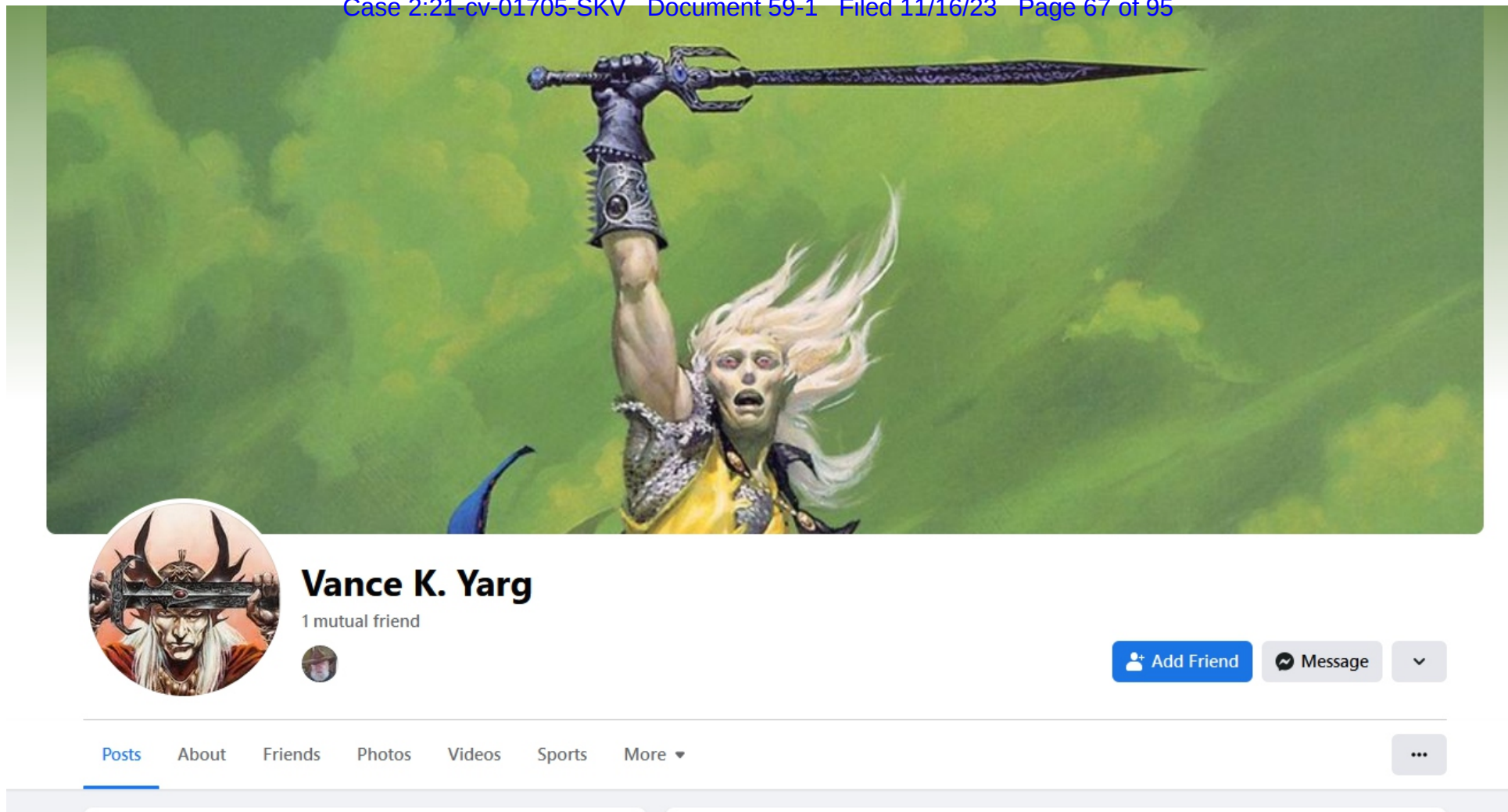
EXHIBIT B



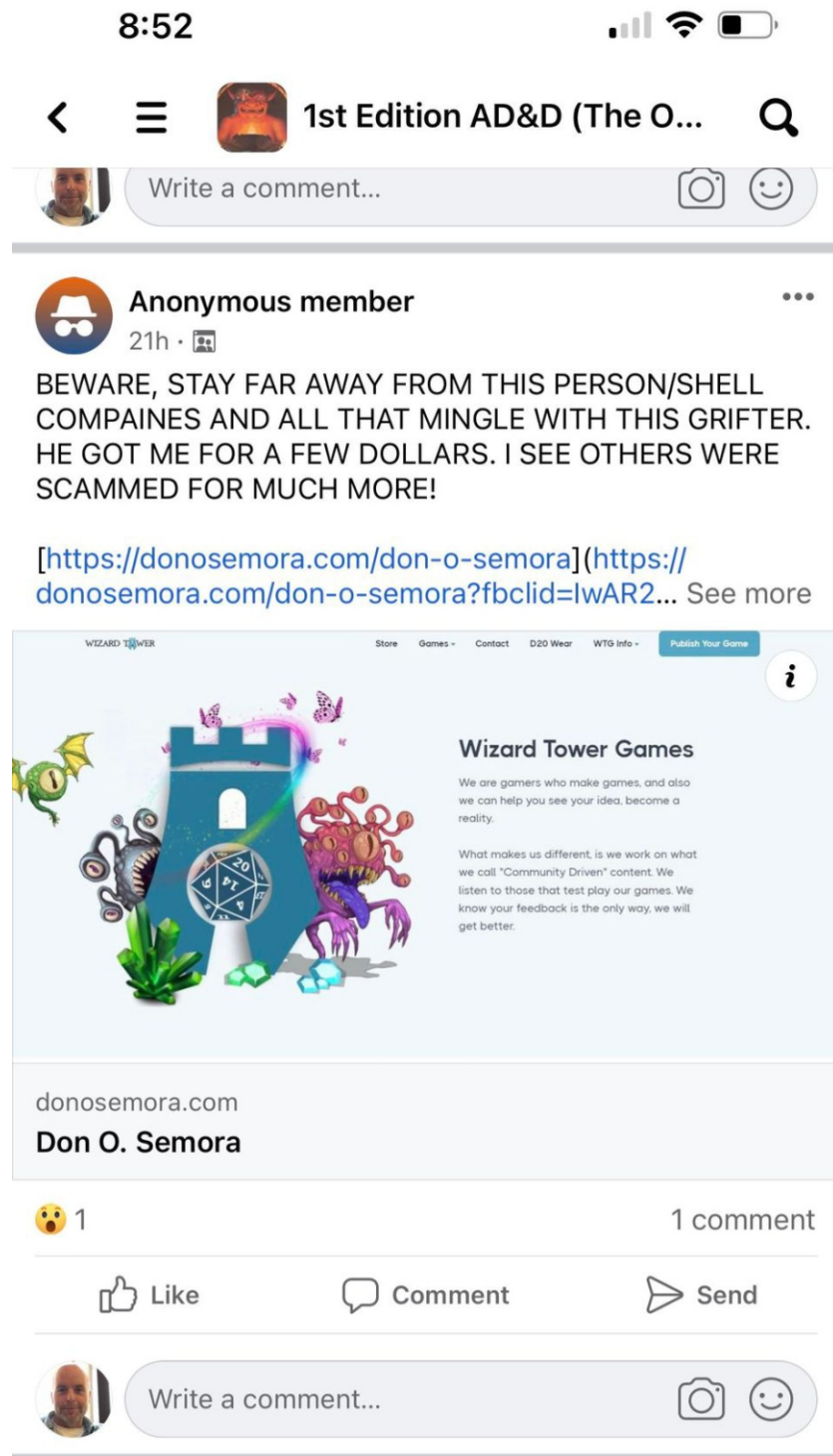
John Scott owner of the 1st edition AD&D group on Facebook (See email for link) letting me know that I was being slandered in his group. I saw this message last night and answered him.



John Scott owner of the 1st edition AD&D group on Facebook
 (See email for link) letting me know the “Anonymous” poster
 (See page 3) was a Vance K. Yarg.



The profile for Vance K. Yarg
URL for it is in the email this PDF is attached to

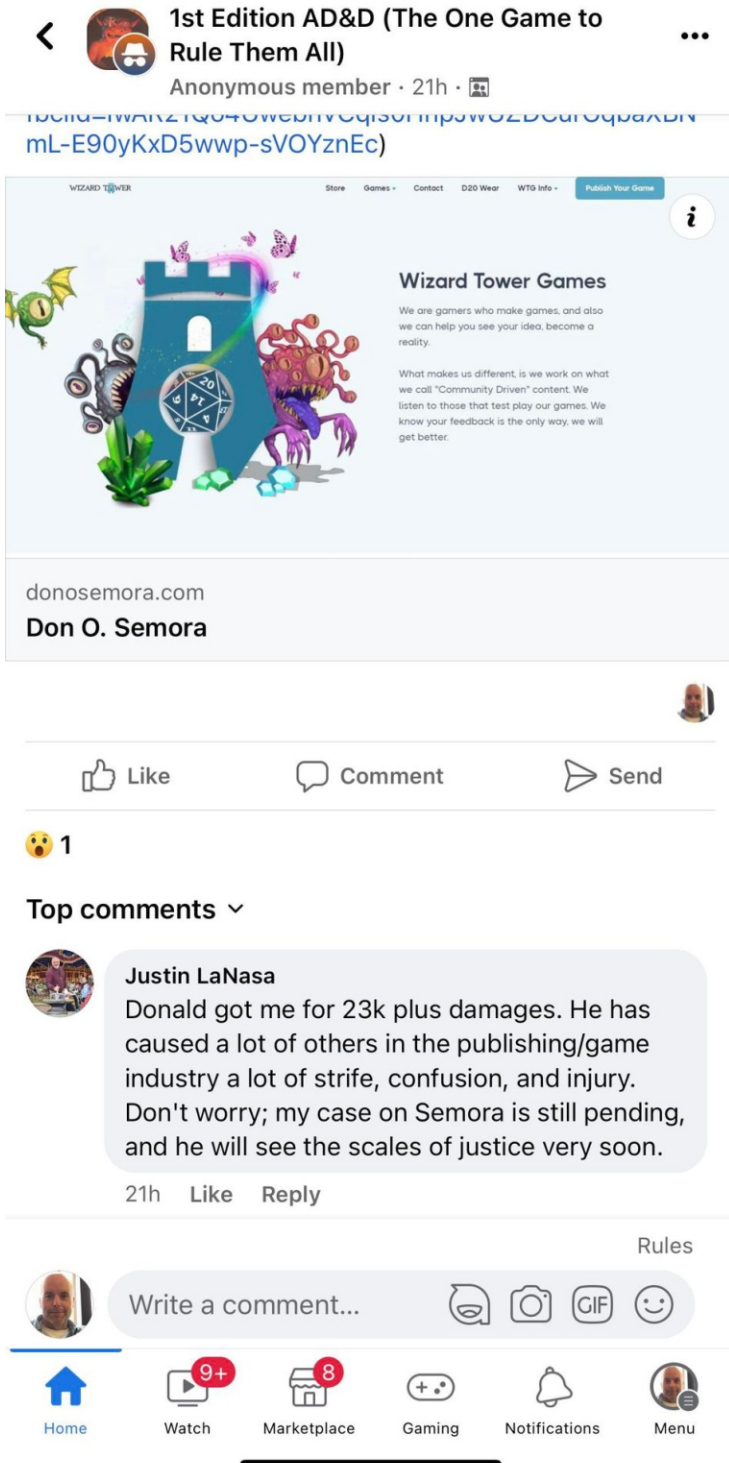


This was shown to me last night 6-14-23 and was posted as you can see 21 hours before hand, so roughly posted on 6-13 aprox.

The account posted that website Lanasa had made about me.

On the previous page you can see that John Scott the 1st Edition ADD&D group owner confirmed it.

Justin then went under it directly and posted. See Page 5



Justin Lanasa directly posting on the post directly.

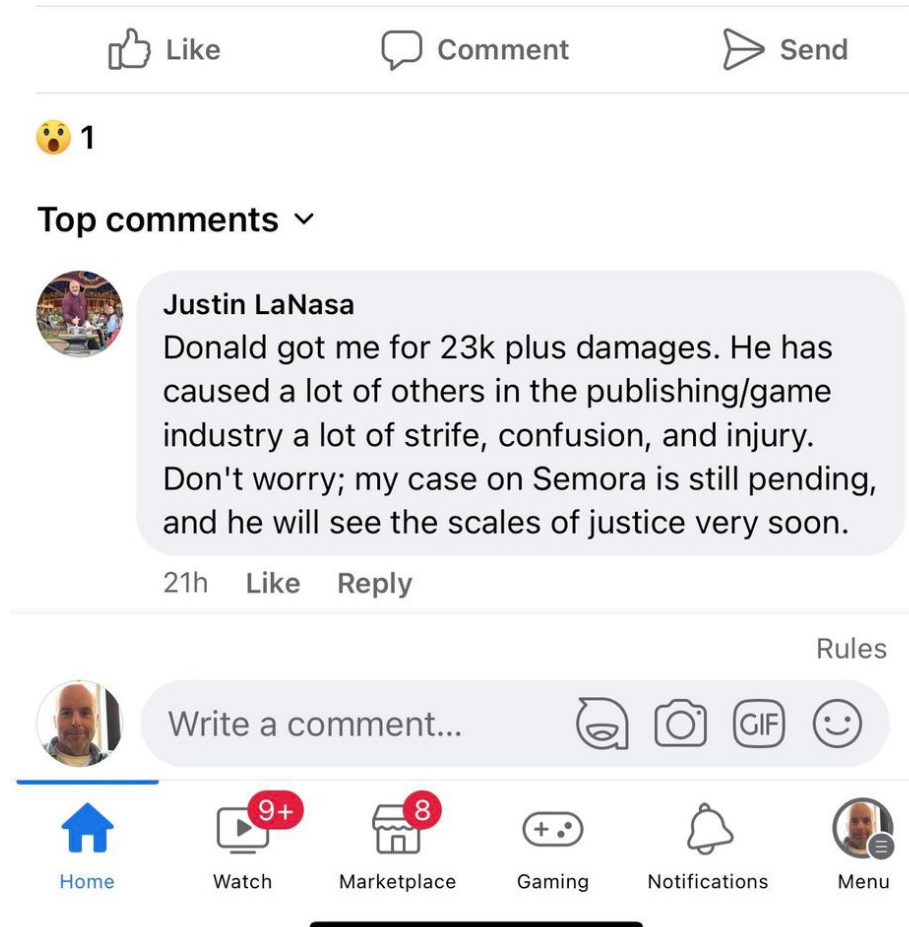


Image expanded



Search



Tenkar's Tavern 1 day ago (edited)

Your link for the relevant docs: https://www.dropbox.com/sh/e0on80zhpr29wpr/AAA98-jAevfENQsX7bd5g_xXa?dl=0

Tenkar's Tavern Facebook Group <https://www.facebook.com/groups/tenkarstavern/>

OSR Facebook Group <https://www.facebook.com/groups/oldschoolgaming/>

Tenkar's Tavern Discord <https://discord.gg/5BTWv347yW...>

Read more

👍 3 💬 Reply



Wizard Tower Games 1 day ago

Games are being played, and they are games one does not want to play with the Bankruptcy Court.

👍 7 💬 Reply

⤴️ • 6 replies



Dungeon Hobby Shop 1 day ago

Lol, as you would know, I think bankruptcy is the only thing you're a pro at! Is that 3 or 5 you have filed hard to track Semora

👍 🗨️ Reply



Tabletop Taproom 1 day ago

[@Dungeon Hobby Shop](#) Oh hey Justine, don't worry about the bankruptcy I'm planning an Indiegogo to raise money for grits so you can feed your family.

👍 2 💬 Reply



Wizard Tower Games 1 day ago

[@Dungeon Hobby Shop](#) since I am going to be a creditor in your case I think debating you online is pointless. We will let the Courts deal with this.

👍 2 💬 Reply



Tenkar's Tavern 1 day ago

[@Dungeon Hobby Shop](#) You forgot to add the disclaimer: I am NOT Justin LaNasa :)

👍 2 💬 Reply



Tabletop Taproom 1 day ago

[@Wizard Tower Games](#) I thought Justin and his social media pages were not to contact you by a judges order in a federal court case?

👍 1 💬 Reply



Wizard Tower Games 1 day ago

[@Tabletop Taproom](#) you are correct.

👍 💬 Reply

Justin using the Dungeon Hobby Shop YouTube account on Tenkars Tavern video a day ago. Video link is in the email this PDF is attached to.

EXHIBIT C

Document title:	(20+) https://donosemora.com/ These are... - Dungeon Hobby Shop Museum Facebook
Capture URL:	https://www.facebook.com/DUNGEONHOBBYSHOP/posts/pfbid02KffKvSQpSbrvKXRfXZiZSPyxYxp4u66gVnXEFkMHVMeZoLztCayCWZnfunB4CG6l
Page loaded at (UTC):	Wed, 21 Jun 2023 16:31:42 GMT
Capture timestamp (UTC):	Wed, 21 Jun 2023 16:32:32 GMT
Capture tool:	10.22.3
Collection server IP:	54.157.181.49
Browser engine:	Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/108.0.5359.215 Safari/537.36
Operating system:	Windows_NT (Node 16.17.1)
PDF length:	3
Capture ID:	vhTjXHWfi4rUYtJbAEB6tJ
User:	dwt-jimbudig



Dungeon Hobby Shop Museum

June 17 at 1:01 PM · 🌐

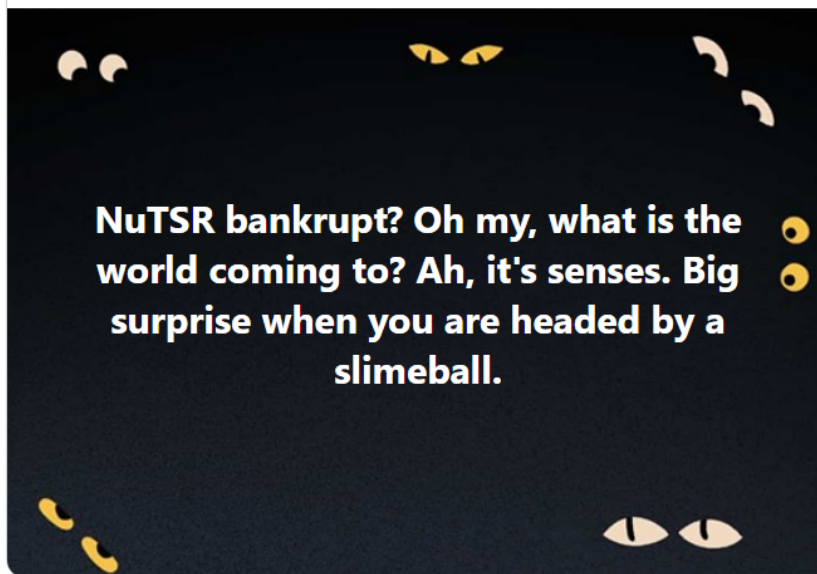
...

<https://donosemora.com/> These are the people that huddle together as a team. I thought that as you get older, you get wiser. This is not the case for some.



Tim Kask

June 15 at 2:40 PM · 🌐



18

9 comments 1 share

Like

Comment

Share

All comments ▾



Write a comment...

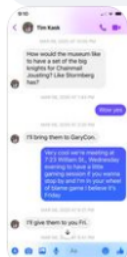


Author

Dungeon Hobby Shop Museum

See how people flip 180 when they are offered more gold from another source "No Honor Among Thieves"

...



Like Reply 4d

4



Top fan

Mick McArt

Dungeon Hobby Shop Museum true

...

Like Reply 4d



Reply to Dungeon Hobby Shop Museum...



Top fan

Vincent Florio

lol he literally sits at conventions and tells people how great he is and tells people how he won't go anywhere unless they pay for it and cover his expenses.. then proceeds to tell people maybe one day you'll get as lucky as him. F that.

...

Like Reply 3d

3



Darren Elbert

His stupidity is staggering when you look at his posts.

...

Like Reply 2d



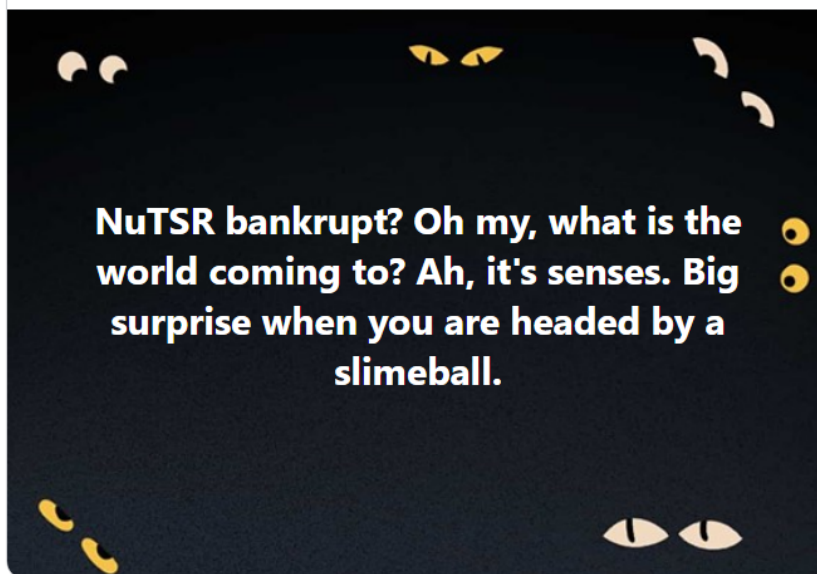


<https://donosemora.com/> These are the people that huddle together as a team. I thought that as you get older, you get wiser. This is not the case for some.



Tim Kask

June 15 at 2:40 PM · 🌐



👍👍👍 18

9 comments 1 share



Like



Comment



Share

All comments ▾



Write a comment...

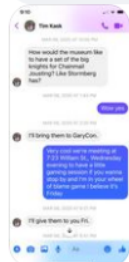


Author

Dungeon Hobby Shop Museum

See how people flip 180 when they are offered more gold from another source "No Honor Among Thieves"

...



Like Reply 4d



4



Top fan

Mick McArt

Dungeon Hobby Shop Museum true

...

Like Reply 4d



Reply to Dungeon Hobby Shop Museum...



Top fan

Vincent Florio

lol he literally sits at conventions and tells people how great he is and tells people how he won't go anywhere unless they pay for it and cover his expenses.. then proceeds to tell people maybe one day you'll get as lucky as him. F that.

...

Like Reply 3d



3



Darren Elbert

His stupidity is staggering when you look at his posts.

...

Like Reply 2d

Write a comment...



EXHIBIT D



Suite 3300
920 Fifth Avenue
Seattle, WA 98104-1610

Lauren Rainwater
206-757-8119 tel
206-757-7358 fax

laurenrainwater@dwt.com

June 20, 2023

Via Email

Algernon L. Butler III
Butler & Butler, L.L.P.
P.O. Box 38
Wilmington, NC 28402
albutleriii@butlerbutler.com

Re: *TSR LLC Violating Protective Order in TSR LLC v. Wizards of the Coast LLC*
Case No. 2:21-cv-01705-SKV (W.D. Wash.)

Dear Mr. Butler:

I represent Wizards of the Coast LLC in litigation involving TSR LLC, Justin LaNasa, and the Dungeon Hobby Shop Museum, Case No. 2:21-cv-01705-SKV (W.D. Wash.). This litigation has been stayed due to TSR LLC's pending bankruptcy petition. *See* 2:21-cv-01705, Dkt. 57. I write to inform you of violations of a protective order entered in that litigation and Wizards' intent to enforce that order. I have copied on this communication Dayna Christian, Nicole McMillan, and Russell Nugent, counsel for TSR LLC and the affiliated parties (the "LaNasa Parties") in the Western District of Washington case.

In November 2022, well before TSR LLC filed its bankruptcy petition, the Western District of Washington court entered the parties' Stipulated Protective Order Governing Conduct. *See* 2:21-cv-01705, Dkt. 47. I have attached that Order as Exhibit A to this letter for your ease of reference. Under that Order, parties are barred from "any direct or indirect conduct to improperly influence testimony or participation in this lawsuit," including

- any public, limited audience, or private statements intended to or likely to have the effect of harassing, intimidating, threatening, or otherwise improperly influencing Witnesses or a Party in this litigation;
- the actual or threatened dissemination of any personal information about Witnesses or a Party, including information of a personal nature regardless of whether it may be available in the public domain;
- use of a Witness's or a Party's name or likeness in a derogatory or harassing manner;
- false and intentionally harassing reports to law enforcement about a Witness or a Party;

June 20, 2023

Page 2

- solicitation, encouragement, or suggestion for others to perform any conduct barred by this Protective Order; and
- any other behavior intended to or likely to have the effect of improperly influencing a Witness or a Party.

Wizards sought and the parties ultimately stipulated to this Order after third-party witnesses and subpoena recipients Don Semora and Michael Hovermale were subjected to harassing and threatening posts online and in direct communications. Among other things, Mr. Semora was the subject of a highly harassing website, donosemora.com. This website publicized personal information about Mr. Semora and disparaged him and his businesses. As counsel for Wizards, I contacted the LaNasa Parties' counsel regarding this website and other harassment occurring in September and October 2022. Although Ms. Christian would not state directly whether the LaNasa Parties were behind the donosemora.com website and the full range of harassing behavior targeting Mr. Semora and Mr. Hovermale, the website and offending posts were taken down by or at the direction of the LaNasa Parties following communication with counsel. I have attached as Exhibit B to this letter selected correspondence between counsel demonstrating this history.

To Wizards' knowledge, these harassing activities ceased for some time in compliance with the Order. However, since TSR LLC filed for bankruptcy on June 8, it appears that the perpetrators of the witness intimidation and harassment have resumed their behavior. The donosemora.com website is back up as of June 14 or earlier. Anonymous posts on Facebook have directed users to that site, referring to Mr. Semora as a "grifter." And Mr. LaNasa, posting on his own account, wrote that Mr. Semora "has caused a lot of others in the publishing/game industry a lot of strife, confusion, and injury," threatening that "he will see the scales of justice very soon." I have attached as Exhibit C to this letter examples of this behavior, captured by my law firm or sent to us by Mr. Semora.

Wizards takes extremely seriously these efforts to harass and intimidate witnesses in the Western District of Washington case, which directly violate the court's Order and offend the judicial process. As I'm sure you are aware, all laws remain effective in bankruptcy as they do at any other time. 28 U.S.C. § 959(b). We therefore intend to seek to enforce this Order.

We request that you (1) inform your client TSR LLC, and Mr. LaNasa as its principal, that the Protective Order in the Western District of Washington remains effective and bars activities intended to or likely to have the effect of harassing, intimidating, threatening, or otherwise improperly influencing witnesses in that case. Please also (2) direct Mr. LaNasa to remove the offending materials and cease any further activities of this nature, or, if appropriate, to direct his associates to do the same. Finally, we request (3) that you let us know your position regarding whether the bankruptcy stay precludes a motion to enforce the Order in the Western District of Washington. While we intend to seek the Bankruptcy Court's confirmation of our procedural rights, we would appreciate knowing whether you would oppose on the basis of the stay such a filing in the Western District of Washington case.

June 20, 2023

Page 3

We request your response on the first two items in the paragraph above by June 22, and your answer regarding the stay by June 28.

Sincerely,

Davis Wright Tremaine LLP

A handwritten signature in blue ink, appearing to read "Lauren Rainwater". The signature is fluid and cursive, with the first name "Lauren" and last name "Rainwater" clearly distinguishable.

Lauren Rainwater

Encl.

Cc: Dayna Christian
Nicole McMillan
Russell Nugent

Exhibit B

Almeida, MaryAnn

From: Dayna Christian <Dayna.Christian@immixlaw.com>
Sent: Thursday, October 20, 2022 12:17 PM
To: Rainwater, Lauren; Almeida, MaryAnn
Cc: Nicole McMillan; Russell Nugent; Dunwoody, Stuart; McCarty, Rose
Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

You are not entitled to convert our email communications into any kind of admission. If you have some legal basis to support your position, please share it.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>
Sent: Thursday, October 20, 2022 11:10 AM
To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>
Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>
Subject: RE: Today's hearing

[This message is from an external sender]

Dayna,

Your refusal to answer the question of whether your client is behind the [Donosemora.com](https://www.donosemora.com) website is a tacit admission that your client created the website. If your client did not create the website, please simply state that. If you continue to refuse to answer this question, we will take that as an admission that your client created the website. This will come up in depositions either way, so I don't understand your refusal to answer the question.

Neither MaryAnn nor I identified Mr. Semora and Mr. Hovermale as "WOTC representatives" during the hearing. The courtroom deputy made that statement, and I do not know why she made that statement. We had no knowledge that they would be attending the hearing, and we never would have characterized them as representatives of Wizards of the Coast. I reiterate again, Mr. Semora and Mr. Hovermale are not representatives or affiliates of Wizards of the Coast, and we do not represent them. The Court expressly acknowledged these facts during the hearing. While she cautioned them to not engage in the behavior that was the subject of the hearing, she acknowledged that they would not be bound by the protective order.

If you somehow believe that DWT or Wizards of the Coast is responsible for the conduct of Mr. Semora or Mr. Hovermale, please explain the basis for your position so that we may address it with the Court, if needed.

Lauren Rainwater | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610
Tel: (206) 757-8119 | Fax: (206) 757-7119
Email: laurenrainwater@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | [Seattle](#) | Washington, D.C.

From: Dayna Christian <Dayna.Christian@immixlaw.com>
Sent: Thursday, October 20, 2022 10:53 AM
To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

Please do not make any assumptions about my prior email – I was very clear and made no such acknowledgement.

At the beginning of the hearing, the unidentified callers were reported to the Court to be “WOTC representatives” by either you or MaryAnn (I can’t recall which of you made that representation to the Court). Later in the hearing, when the callers were required to identify themselves, Mr. Hovermale reported that he was attending “on behalf of WOTC” or something to that extent. I believe Mr. Semora made the same representation.

The Court was careful to not only address Mr. Hovermale and Mr. Semora directly, but also to ensure that the draft PO included all direct and indirect actions by any party and to include all affiliates of any party. Based on the introduction of the callers and their own introductions to the Court, it was made clear that both men are affiliates of WOTC.

Please let me know if you disagree. Maybe it won’t matter at all if no one violates the Court’s instructions.

Thanks.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>

Sent: Wednesday, October 19, 2022 4:54 PM

To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[This message is from an external sender]

Hi Dayna,

I will take your answer below as an acknowledgement that your client created the Donosemora.com website. Please correct me if that is inaccurate.

We appreciate that you have instructed your client to immediately comply with the Court’s instructions today. Wizards of the Coast has never engaged in the conduct discussed today, and it will continue refraining from such conduct in accordance with the Court’s instructions.

With respect to conduct by Mr. Semora and Mr. Hovermale, as you know, I do not represent them and they are not parties to this lawsuit. As such, they are not bound by the forthcoming protective order, and I have no ability to control their actions. However, both were present during the hearing, and I anticipate they will act in accordance with the Court’s instructions.

Lauren Rainwater | Davis Wright Tremaine LLP

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610

Tel: (206) 757-8119 | Fax: (206) 757-7119

Email: laurenrainwater@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Dayna Christian <Dayna.Christian@immixlaw.com>

Sent: Wednesday, October 19, 2022 4:28 PM

To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuardunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

I'm told that the video is now down.

I not aware of any intention for the Don Semora website to be live while this case is pending.

I have no idea who may have sent the Anonymousemails to Don Semora and/or Michael Hovermale but I believe that my client is being truthful when he says that it was not him.

Mr. Griffin is a known affiliate of Don Semora and Michael Hovermale. My client and I were not aware of the claim that "Liam Bombardo" is actually Mr. Griffin and question whether that's an accurate claim. Regardless, I trust that the Court's admonition to all parties and witnesses will extend to "indirect" activities such as those of Mr. Griffin.

I've instructed my client to consider the Court's instructions for our pending Protective Order as a directive for immediate compliance. That would include the subjects raised in your email below. I trust you've done the same on your end.

Thank you.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>

Sent: Wednesday, October 19, 2022 1:15 PM

To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuardunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[This message is from an external sender]

Dayna,

I mentioned the below video, which is still available on YouTube:

<https://www.youtube.com/watch?v=p7GuDLkdCVg&t=1s>

Thank you for your attention in having that removed.

Could you please confirm whether your clients or any of their family members or associates are behind the Donosemora.com website? If so, please confirm that the website will be permanently taken down.

Could you also please confirm whether your clients or any of their family members or associates sending anonymous emails to Mr. Semora or Mr. Hovermale or anonymously sending mass emails regarding those individuals? If so, please confirm this behavior will stop.

With respect to the Liam Barbardo account name, I have been contacted by a gentleman named Scott Griffin who confirmed that is his account. I also understand that Mr. Lanasa was aware Mr. Griffin was behind that account and that all of the messages between them were private—not publicly posted.

Lauren Rainwater | Davis Wright Tremaine LLP

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610

Tel: (206) 757-8119 | Fax: (206) 757-7119

Email: laurenrainwater@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Dayna Christian <Dayna.Christian@immixlaw.com>

Sent: Wednesday, October 19, 2022 12:30 PM

To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>

Subject: Today's hearing

[EXTERNAL]

Lauren –

During the hearing today you mentioned that there were things that you found online that were still live as of this morning that you expected to have been taken down. I didn't write fast enough to note what those were. Can you please remind me and I'll get those addressed?

Thank you,

Dayna J. Christian | Attorney

[Immix Law Group PC](http://www.immixlaw.com)

[600 NW Naito Parkway | Suite G | Portland OR | 97209](#)

Portland (503) 802.5533 | **F** (503) 802.5351 | **D** (503) 802.5537

dayna.christian@immixlaw.com

Immix Law Group is proud to be a [Certified B Corporation](#).

EXHIBIT E

From: info@wizardtowergames.com <info@wizardtowergames.com>
Sent: Monday, November 6, 2023 6:32 AM
To: 'Kelly Walden' <kwalden@kelloggarena.com>
Cc: Rainwater, Lauren <LaurenRainwater@dwt.com>
Subject: RE: Wizard Con 2024

[EXTERNAL]

Ms. Walden:

The lead attorney for Wizards of the Coast is named Lauren Rainwater:
Her cell number is as follows – 206-757-8119
She is with the legal team handling the Federal Protection Order for myself and other witnesses.

Her email is: laurenrainwater@dwt.com

Mr. Lanasa and his partners use Anonymous email to attack myself, and I hope you reach out to her to deal this.

Don

From: Kelly Walden <kwalden@kelloggarena.com>

Sent: Monday, November 6, 2023 9:12 AM

To: info@wizardtowergames.com

Subject: Re: Wizard Con 2024

Good morning Don,

We have received a few emails that this is a fraudulent event. Did you have issues at a previous event that would cause people to reach out to us at the arena?

Please give me a call so we can discuss before moving forward.

Thank you,

-Kelly

On Sun, Nov 5, 2023 at 11:14 AM <info@wizardtowergames.com> wrote:

Hello Ms. Walden

We met a couple weeks ago about WizardCon 2024 for July 19, 20, 21 2024

I am attaching our layout plan and ask that you prepare a contract as discussed. The contract information is as follows.

Wizardcon llc is the main contract holder.

Donald Semora is the main point of contact.

My cell is – [REDACTED]

Email is this one – info@wizardtowergames.com

Once prepared we will review, sign and bring it over with a cashiers check for the deposit. We are looking very forward to the event. Below is the main website and Facebook for the event that is being updated daily.

www.wizardcon.org

<https://www.facebook.com/thewizardcon>

Your help and tour was greatly appreciated.

Don

--

Kelly Walden

Interim General Manager

DL 269.788.1102

O 269.963.4800

1 McCamly Square

Battle Creek, MI 49017

KELLOGG ARENA



From: info@wizardtowergames.com <info@wizardtowergames.com>
Sent: Tuesday, November 7, 2023 10:53 AM
To: Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>; Rainwater, Lauren <LaurenRainwater@dwt.com>
Subject: FW: New submission from Contact

[EXTERNAL]

Ms. Almeida and Ms. Rainwater

As you can see it was Justin Lanasa, as right before the anonymous emails, he sent his own name, email and number verifying I was doing the event there. I am not sure how much more I am expected to take. I think my tolerance and patience in this have been beyond required.

I am asking something be done as soon as you are able.

Don

From: Kelly Walden <kwalden@kelloggarena.com>
Sent: Tuesday, November 7, 2023 1:48 PM
To: info@wizardtowergames.com
Subject: Fwd: New submission from Contact

Hi Don,
Found this while trying to find the other email. With his name on it, then he started the emails from a private address. Can you give me the times on each day again please and your move in move out day/time. I am putting the rental quote together to send out.
I have a meeting tomorrow with our board and I plan on sending out your contract right after I receive final approval. I apologize for all of these extra steps, but like I said earlier this morning, we are a city owned venue, so just making sure I cover all the bases.
Thank you for understanding!
-Kelly

----- Forwarded message -----

From: kwalden@kelloggarena.com <kwalden@kelloggarena.com>

Date: Wed, Oct 18, 2023 at 12:24 PM

Subject: New submission from Contact

To: <kwalden@kelloggarena.com>

Name
Justin LaNasa
Email
[REDACTED]
Phone
[REDACTED]
Venue of Inquiry
<ul style="list-style-type: none">Kellogg Arena
Comments/Questions
I have a question is this person Don Semora /Wizard con have your venue registered for July 19-24 2024

--

Kelly Walden

Interim General Manager

DL 269.788.1102

O 269.963.4800

1 McCamly Square

Battle Creek, MI 49017

KELLOGG ARENA



EXHIBIT F

News



Anonymousemail <noreply@anonymousemail.me>
to Wizardtowergameslc ▾

7:36 PM (8 minutes ago)



Powered by **Anonymousemail** → [Join Us!](#)

This is not Justin or anyone else who knows him, your day is coming prison is where you are going No convention will happen your LIES Don will be exposed We are emailing everyone the nice pics of your wife AI is a wonderful thing You can't do anything about it

↩ Reply

➦ Forward

EXHIBIT G



SO ORDERED.

SIGNED this 13 day of November, 2023.

A handwritten signature in blue ink that reads "David M. Warren".

David M. Warren
United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION

In re: TSR LLC,

Debtor.

Case No.: 23-01577-5-DMW

**CONSENT ORDER WITH REGARD WIZARDS OF THE COAST LLC'S MOTION
FOR CONFIRMATION THAT THE AUTOMATIC STAY DOES NOT APPLY OR,
IN THE ALTERNATIVE, FOR RELIEF FROM THE AUTOMATIC STAY**

THIS MATTER is before the Court upon the consent of Movant Wizards of the Coast LLC ("Wizards") and John C. Bircher, Chapter 7 Trustee ("Trustee"). Based on the consent of the parties, the Court makes the following findings of fact and conclusions of law:

FINDINGS OF FACT

1. Wizards has ongoing litigation pending in the United States District Court for the Western District of Washington with Debtor TSR LLC ("Debtor"), its principal and creditor Justin LaNasa ("LaNasa"), and Dungeon Hobby Shop Museum ("Museum"), an affiliated business (together, the "LaNasa Parties"), over infringement of Wizards' common law trademark rights. That Washington litigation was automatically stayed by Debtor's bankruptcy petition.

2. Wizards contends that following the Petition Date, LaNasa began violating a protective order from the Washington federal court that barred the parties from harassing or otherwise attempting to unduly influence witnesses in that case. Wizards contends that it needs to move the Washington court to enforce that protective order and for sanctions for its violation.

3. Wizards is a publisher of fantasy games, including the renowned Dungeons & Dragons game franchise, which it acquired through its 1997 acquisition of D&D's original

publisher TSR, Inc. In 2021, newly-formed TSR LLC sued Wizards in the Western District of Washington, seeking a declaratory judgment that Wizards does not own various trademarks originally established by TSR, Inc., including the work mark “TSR,” various logos, and marks for “Star Frontiers,” another game originally published by TSR, Inc. See 21-cv-1705, Dkt. 1 (W.D. Wash. Dec. 29, 2021). Wizards filed an answer stating its common-law trademark rights in the marks due to continuous use predating TSR LLC’s use and asserting counterclaims against Debtor, LaNasa, and the Museum for infringing its rights. 21-cv-1705, Dkt. 11.

4. In connection with the Washington litigation, Wizards subpoenaed third-party witnesses Don Semora and Michael Hovermale in fall 2022. Shortly after receiving these subpoenas, Semora and Hovermale were subjected to harassing and threatening posts online and in direct communications. Among other things, Semora was the subject of a highly harassing website, donosemora.com. This website publicized personal information about Semora and disparaged him and his businesses. Wizards’ counsel contacted the LaNasa Parties’ counsel regarding this website and other harassment occurring in September and October 2022, and it ultimately brought the behavior to the Washington court.

5. The Washington court entered the parties’ stipulated protective order on November 4, 2022. Under that order, parties are barred from “any direct or indirect conduct to improperly influence testimony or participation in this lawsuit,” including:

- any public, limited audience, or private statements intended to or likely to have the effect of harassing, intimidating, threatening, or otherwise improperly influencing Witnesses or a Party in this litigation;
- the actual or threatened dissemination of any personal information about Witnesses or a Party, including information of a personal nature regardless of whether it may be available in the public domain;
- use of a Witness’s or a Party’s name or likeness in a derogatory or harassing manner;
- false and intentionally harassing reports to law enforcement about a Witness or a Party;
- solicitation, encouragement, or suggestion for others to perform any conduct barred by this Protective Order; and
- any other behavior intended to or likely to have the effect of improperly influencing a Witness or a Party.

6. To Wizards' knowledge, these harassing activities ceased for some time in compliance with the protective order. However, when the Debtor filed for bankruptcy on June 8, 2023, the perpetrators of the witness intimidation and harassment allegedly resumed their behavior.

7. This alleged activity violated the Washington court's protective order and should be brought to that court's attention. *See* 21-cv-1705 Dkt. 47 ¶ 4 ("Any violation of this Protective Order shall be brought to the Court's attention."). Wizards filed its Motion seeking confirmation from this Court of its ability to do so without violating the bankruptcy stay, or, in the alternative, relief from the stay for that purpose.

CONCLUSIONS OF LAW

1. "As a general proposition, the stay imposed under § 362(a)(1) applies only to bar proceedings against the debtor, and does not apply to actions against non-debtor third parties or codefendants of the debtor." *Holland v. High Power Energy*, 248 B.R. 53, 57 (S.D.W. Va. 2000).

2. LaNasa and Museum are non-debtor third-parties and the automatic stay does not apply to those parties.

3. Pursuant to 11 U.S.C. § 541(a), the filing of the bankruptcy petition created an estate. The Trustee was appointed pursuant to Chapter 7 of the Bankruptcy Code. The creation of the estate and appointment of the Trustee had the legal effect of precluding LaNasa, and any other former officer or director of the Debtor, from acting on the Debtor's behalf. As a result, any conduct of LaNasa and/or Museum that occurred post-petition could not legally be imputed to the Debtor.

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

A. The automatic stay does not apply to any action Wizards wishes to take with respect to LaNasa and/or Museum.

B. LaNasa's and/or Museum's post-petition conduct may not be legally imputed to the Debtor.

WE CONSENT:

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